



TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 77 AND TOWN AND COUNTRY
PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000

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PROOF OF EVIDENCE ON BEHALF OF THE HISTORIC BUILDINGS AND MONUMENTS
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)

Application for planning permission for the comprehensive redevelopment of Anglia Square and adjacent land on Edward Street for up to 1250 dwellings, hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship and associated works to the highway and public realm areas, Anglia Square, Norwich, by Weston Homes PLC.

Local Planning Authority Application reference: 18/00330/F

PINS reference: APP/G2625/V/19/3225505

“Norwich has everything – a cathedral, a major castle on a mound right in the middle, walls and towers, an admittedly disturbed medieval centre with winding streets and alleys, thirty-five medieval churches, and a river...”.

Nikolaus Pevsner and Bill Wilson

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1. SUMMARY

- 1.1. Norwich is one of England's – and Europe's – great historic cities. Set in the valley of the River Wensum, surveyed by its Norman castle from the ridge above the river, with the tower and later spire of its Norman cathedral rising from its heart, the fabric of the city, shaped by an ancient web of streets and spaces, extends across the extensive area once encompassed by the city's medieval walls. Norwich is a city rich in beauty and history.
- 1.2. It is not, of course, unspoilt. Like many places in England, Norwich suffered both due to bomb damage and then due to the nature of development in the second half of the 20th century. Among the most harmful developments of the post-war period was the development of what is now Anglia Square in the 1960s and 1970s. A substantial area of the historic city was cleared to make way for this development, entailing the loss not only of handsome buildings but also of part of the network of streets which shaped the city. The development itself was radically at odds with the pattern of the city. Now failing, few people today dispute the case for its removal.
- 1.3. The application by Weston Homes and Columbia Threadneedle which is the subject of this inquiry sets out proposals for the comprehensive redevelopment of Anglia Square. Were they to be implemented, they would entail the demolition of the majority of the present buildings, and the redevelopment of the site, including those parts left empty when the earlier scheme stalled.

- 1.4. Unfortunately these proposals for the redevelopment of Anglia Square would be more harmful to Norwich's character and interest than is the existing development. They would do little to repair the damage caused by the present development, and what little they would do would be wholly eclipsed by the impact of the new development. This would severely harm Norwich's extraordinary historic character, damaging one's appreciation of the city's great monuments – the Norman castle and medieval cathedral, the Roman Catholic cathedral, City Hall and the numerous medieval churches which support them – and that of the rich historic cityscape, formed of streets, spaces and the historic buildings by which they are defined. It would be profoundly damaging to the pattern of the city. That harm would be engendered by the disparity of the scale of the development as a whole, which would be foreign to the character of the city, and by the proposed tower, which, rising to 20 stories, would radically disrupt the character of the cityscape, formed as it is by the interplay of the city's topography, its great monuments and the wider configuration of streets and spaces within which the latter are set.
- 1.5. This application therefore raises fundamental questions. Should such harmful development be permitted in a place so special as Norwich? Given the considerable protection afforded to the conservation and preservation of historic sites, monuments, buildings and places by legislation and policy, how can severe harm to Norwich, whose exceptional interest is reflected in the number and nature of the designations not only of scheduled monuments and listed buildings but also of the

entire medieval city itself as a single conservation area, be justified, and what sort of public benefit might outweigh such harm?

- 1.6. The body of law and policy which provides protection for the historic environment, and for designated heritage assets in particular, is clear. The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes statutory tests in respect of the protection of listed buildings and conservation areas. The National Planning Policy Framework makes the protection of the historic environment an integral part of the achievement of sustainable development. It provides rigorous policies for the conservation of the significance of designated heritage assets. Norwich's Local Plan supplements these policies with its own provisions for the conservation of the city's heritage. The Framework requires that the weight to be accorded to the conservation of heritage assets should be great, and that it should be proportionate to the significance of the assets concerned.

- 1.7. The significance of Norwich is of the highest. The city's castle and medieval cathedral are of European importance. The number of the city's medieval churches is unsurpassed in northern Europe. The plan of the city remains, at its centre, the plan the Normans created; and, although much impaired in places, the city within the circuit of its exceptionally extensive medieval walls preserves much of its medieval plan. Castle, cathedral, the laying out of spaces and streets, and the wealth of fine historic buildings which define them, together create what I shall refer to as "the pattern of the city". The exceptional significance of both parts and whole is not in doubt. Castle, cathedral, extant walls and many other buildings are scheduled or

listed, many at the highest grades. The historic city, as defined by the circuit of the walls, forms the Norwich City Centre Conservation Area; and while conservation areas are not graded the exceptional nature of its special architectural and historic character cannot be challenged.

- 1.8. The effect of the proposed development on the significance of the historic city would be striking and severe. Norwich City Council’s own planning officers have described the development’s presence, were it to be built, as being like “a city within a city”¹. The form and bulk of the proposed development would be wholly at odds with the pattern of the city. It would rise above the cityscape far more obtrusively than does the present Anglia Square. The proposed 20-storey tower would greatly exacerbate its presence.
- 1.9. The proposed development would cause severe harm to the character of the conservation area. This would be harm of a very high degree, although falling short of what the Framework refers to as substantial harm. The development would also cause harm in varying degrees to the significance of many other designated heritage assets as a result of the damage it would do to their settings. In the case of the castle and cathedral, and the other great landmarks of Norwich, that harm would be considerable. In the case of a number of buildings particularly close to the site it would be severe. In all cases it would, in the Framework’s terminology, fall below the threshold for substantial harm.

¹ CD9.1. Norwich City Council (henceforth “the Council” or, in references, “NCC”), Officers’ Report, paragraph 326, p. 92.

- 1.10. It follows that the statutory tests and the Framework's injunction that great weight be accorded the conservation of the significance of designated heritage assets are engaged. The significance of the assets being, in this case, of the highest, the weight given to conservation must also be of the highest.
- 1.11. The Framework requires clear and convincing justification for all harm to designated heritage assets. It is not apparent that there is such justification in this case. This may be in part because the applicants, while acknowledging that their proposals would cause some harm, argue that this would be limited; but even were their analysis accepted, all harm to designated heritage assets requires justification. In so far as any justification has been offered, it lies in the balance between the harm and the public benefit which would flow from the proposed development, and the argument that the form of the particular development proposed is necessary to secure the redevelopment of the site.
- 1.12. The argument that the particular circumstances of the market, and those of the applicants, provide clear and convincing justification for such harm is not persuasive. This is particularly so, given that the application scheme is not a viable scheme, and has been made marginally viable only by the provision of substantial public subsidy. If such subsidy is available, it is not at all evident that it should be used to secure the implementation of proposals which would profoundly harm the character and interest of Norwich.

- 1.13. The Framework requires the decision-maker to weigh harm, if less than substantial, against such public benefits as would be obtained. Historic England does not comment on public benefits beyond its own remit, but I make two observations here.
- 1.14. The first is that the purported “heritage benefits” flowing from the proposed development would be slight. Even allowing for the great weight to be given to conservation, which must be engaged as much by benefits as by harm, there would be little to which to attach such weight. These benefits would be vastly outweighed by the harm consequent on the development.
- 1.15. The second is that given the exceptional significance of Norwich, and its buildings and monuments, and given the extent and degree of the harm which would flow from the development, one would not expect that harm to be outweighed unless the benefits obtained were found to be as exceptional as the heritage assets being harmed.
- 1.16. The proposed development also runs counter to the Local Plan’s policies for the conservation of designated heritage assets.
- 1.17. The proposals must also be assessed in the light of design policies. Insofar as these engage with policies for the historic environment, here too the proposed development would fail to answer the requirements of the Framework and those of the Local Plan.

- 1.18. Prompted by the importance of this site to Norwich and its conservation, and by the Council's observation, in the Policy Guidance Note drafted as these proposals were being developed, that they represented only one possible approach to the redevelopment of Anglia Square, Historic England commissioned Ash Sakula Architects to explore an alternative approach sympathetic to the character of the city.
- 1.19. Ash Sakula have responded by illustrating how Anglia Square might be redeveloped in a way which at once repairs the damage done to the pattern of the city in the 1960s and 1970s and gives to Norwich a contemporary neighbourhood to renew the heart of the northern city. Their alternative approach could provide much of what both the Council and the community seek from the redevelopment of Anglia Square, and could do so in a manner which fulfils the Framework's injunction that social, economic and environmental objectives of planning be pursued in mutually supportive ways. Historic England does not suggest that Ash Sakula's approach would be viable in current circumstances, but I commend their proposals to the Inquiry as illustrating how Anglia Square could be redeveloped so as to realise the potential of the site in a manner appropriate to the significance of this exceptional historic city. Ash Sakula's report is appended to this proof.
- 1.20. Given the harm that the applicants' proposals would do to the character and significance of Norwich, and given their failure to meet the expectations of design policies, I consider that these proposals fall far short of the Framework's intention

that the planning system should promote the achievement of sustainable development, in which social, economic and environmental needs are met together.

- 1.21. The application raises fundamental questions about the future of Norwich.
- 1.22. Norwich is a great historic city which provides a rich and stimulating theatre for contemporary life. We know that historic places are valued for their beauty, provide fertile ground for creative and innovative businesses, attract tourists (a major contributor to Norwich's economy) and are wonderful places in which to live. We also know that historic places are adaptable, that they have the capacity to accommodate growth and to add to their character with fine contemporary buildings which combine modernity and a natural respect for the grain and character of their setting. Ash Sakula's alternative shows how this could be true of Anglia Square. Norwich can change and grow without damaging the essential character which makes the city so special.
- 1.23. It will be for the Inspector and, ultimately, for the Secretary of State, to determine whether the public benefit claimed by the applicants for these proposals could be thought to outweigh the severe harm to the extraordinary character and interest of Norwich which they would cause, or whether the approval of these proposals would be consistent with the statutory requirements to have special regard to the desirability of preserving listed buildings and their settings and pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. I conclude, however, that the proposals which are the subject of

this inquiry run counter to the Framework’s aspiration for sustainable development and fundamentally counter to all policies for the conservation of the historic environment and the significance of designated heritage assets , and would, were they to be approved and implemented, cause severe and lasting harm to something which it should be the objective of planning policies to protect for our and future generations, the extraordinary character and significance of Norwich.

2. PERSONAL STATEMENT

- 2.1. My name is John Neale. I hold the degree of Master of Arts from the University of Oxford, where I read Modern History, and am a member of the Institute of Historic Buildings Conservation.
- 2.2. I am Head of Development Advice for Historic England. In this role I have oversight of Historic England's advice to local planning authorities, applicants and their agents and others about the management of change to designated heritage assets. I am responsible for ensuring that Historic England's advice is consistent with legislation, national policy and guidance and our own published advice. I have a particular role in Historic England's most complex or contentious casework and am Secretary to the Historic England Advisory Committee and to Historic England's London Advisory Committee.
- 2.3. Prior to appointment to my present role I was for three years Historic England's Planning Director for the East of England, with responsibility for a wide range of work. In this role I oversaw Historic England's assessment of the application which is the subject of this inquiry, and spoke at the meeting of Norwich City Council's Planning Committee at which the Council reached its determination of the application.

- 2.4. Between 2000, when I joined what was then English Heritage, and 2016 I was successively Inspector of Historic Buildings, Team Leader and Principal Inspector of Historic Buildings and Areas. In the latter role I led the team responsible for Historic England’s development advice in Cambridgeshire, Essex and Hertfordshire.
- 2.5. Prior to joining Historic England I worked between 1991 and 2000 for the Georgian Group, one of the statutory amenity societies. As Casework Secretary I was responsible for responses to applications for listed building consent notified to the Group and other casework. During part of that period I was a member of the Bloomsbury Conservation Area Advisory Committee.
- 2.6. I am currently a member of the Fabric Advisory Committee for St. Paul’s Cathedral.
- 2.7. The evidence which I have prepared in this proof of evidence is true, and I confirm that the opinions I express are my true and professional opinions.
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3. THE ROLE OF HISTORIC ENGLAND AND ITS INVOLVEMENT TO DATE

- 3.1. Historic England’s role, and its involvement in this case prior to the Secretary of State’s call in, are set out in its Statement of Case². Copies of the advice it provided to the applicants and to Norwich City Council are appended to this proof³.
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² CD11.3. Historic England (henceforth in references “HE”), Statement of Case, sections 2 and 4, pp. 4-5 and 8-11.

³ HE1/3 Appendix 2: Historic England Documents.

4. ANGLIA SQUARE, NORWICH

- 4.1. Anglia Square stands in the northern part of historic Norwich, between the River Wensum and the city's walls, adjacent to what was the junction of Magdalen and Botolph Streets, where two of the principal routes from the north converged before crossing the river at Fye Bridge⁴.
- 4.2. The area occupied by the present development once formed part of the network of streets which make up the fabric of the city. Botolph Street was joined by Middle Street and Calvert Street, running south to the river. These streets, and the lesser lanes and numerous yards which ran off them, were densely built, lined with houses, workshops, breweries, opening on occasion to gardens.
- 4.3. By the time the construction of what is now Anglia Square was planned, the pattern of development had been altered by both industrial development – mid-19th century Ordnance Survey maps record the presence of a large complex annotated “Crape Manufactory” – and bombing.
- 4.4. Anglia Square was the product of the post-war approach to urban redevelopment at its height. Associated with the construction of the inner link road (1968-75), the area

⁴ For the points made here and in the subsequent paragraphs, see the extract from the Ordnance Survey map of 1893 in HE1/2 Appendix 1: Ash Sakula Report, page 2. This account is taken from Nikolaus Pevsner and Bill Wilson, *The Buildings of England – Norfolk 1: Norwich and North-East*, 1997 (henceforth “Pevsner and Wilson” or, in references, “BoE”).

now occupied by Anglia Square was subject to what was conceived as a comprehensive redevelopment in the late 1960s and early 1970s. This entailed the loss of Botolph Street, and of parts of the lesser streets which joined it, and the construction of Sovereign House, the cinema, Guildengate House and the multi-storey car park.

4.5. The projected comprehensive redevelopment of the site was never completed; and the development itself has proved flawed. A large area occupying the west of the site was left empty. Sovereign House has remained vacant since its original tenants, Her Majesty's Stationery Office, moved out; Guildengate is partially occupied by artists on short-term leases; and the multi-storey car park closed in 2012, having been found unsafe⁵.

4.6. The site, including two small pockets of land to the north, comprises 4.11 hectares. It lies within the Norwich City Centre Conservation Area⁶. It forms the principal part of the Anglia Square character area identified in the Conservation Area Appraisal⁷

⁵ See the 1994 Ordnance Survey map in CD 4.10, Broadway Malyan, Design and Access Statement (henceforth in references "DAS"), March 2018, p. 21.

⁶ CD2.10. An account of the conservation area's character is provided in the Norwich City Centre Conservation Area Appraisal, Norwich City Council, 2007 (henceforth "Conservation Area Appraisal" or "NCC CAA" in references).

⁷ CD2.10. NCC CAA, pp. 43-48.

5. LEGISLATION, POLICY, GUIDANCE AND PUBLISHED ADVICE

5.1. Within the compass of legislation, policy and guidance relating to the planning system, understood broadly, there is robust provision for the protection of the historic environment, and particularly for that of those elements which are designated as heritage assets. I draw attention to those elements most pertinent to this inquiry here.

Legislation

5.2. The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes the statutory protection afforded to both listed buildings and conservation areas⁸. The Listed Buildings Act 1990 establishes a statutory duty for decision-makers when determining applications for planning permission which would affect a listed building or its setting. The duty requires the following.

*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*⁹

⁸ CD11.25. Planning (Listed Buildings and Conservation Areas) Act 1990 (henceforth “the Listed Buildings Act 1990”).

⁹ CD11.25. The Listed Buildings Act 1990, section 66, 1.

- 5.3. The Listed Buildings Act 1990 establishes a similar duty in respect of conservation areas, as follows.

In the exercise, with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area¹⁰.

National Planning Policy and Guidance

- 5.4. The National Planning Policy Framework sets out the Government’s planning policies, in which the protection of the historic environment plays an important role¹¹. It is supported by the Planning Practice Guidance¹².
- 5.5. The Framework provides that the purpose of the planning system is to help achieve sustainable development¹³. To achieve sustainable development the Framework indicates that the planning system must pursue three objectives: an economic, a social and an environmental objective; and the latter encompasses the protection and enhancement of the historic environment. These objectives are “interdependent and need to be pursued in mutually supportive ways”¹⁴.

¹⁰ CD11.25. The Listed Buildings Act 1990, section 72, 1. The provisions referred to in subsection 2 include the Planning Acts.

¹¹ CD1.1. Ministry of Housing, Communities and Local Government (henceforth in references “MHCLG”), National Planning Policy Framework (henceforth “the Framework” or, in references, “NPPF”), February 2019.

¹² CD1.2. MHCLG, Planning Practice Guidance (henceforth “the Planning Practice Guidance” or, in references, “PPG”), November 2016 and subsequently revised - <https://www.gov.uk/government/collections/planning-practice-guidance>

¹³ CD1.1. NPPF, 7.

¹⁴ CD1.1. NPPF, 8.

- 5.6. The Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development, and to this end establishes a presumption in favour of sustainable development¹⁵. While it has already been stated that the protection and enhancement of the historic environment is part of one of sustainable development’s objectives, in the framing of the presumption the Framework makes clear that the presumption in favour of granting planning permission does not apply if “ (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; (ii) or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”. The areas and assets to which this policy refers include designated heritage assets¹⁶.
- 5.7. The Framework provides policies for the conserving and enhancing the historic environment¹⁷. Conservation is defined as “The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance”¹⁸. These encompass both plan-making and development management.
- 5.8. The concept of “significance” is critical to the approach established by the Framework. The term is defined in Annex 2 in relation to heritage policy¹⁹. The

¹⁵ CD1.1. NPPF, 9, 10.

¹⁶ CD1.1. NPPF, 11, footnote 6.

¹⁷ CD1.1. NPPF, Chapter 16.

¹⁸ CD1.1. NPPF, Annex 2, Glossary, p. 65.

¹⁹ CD1.1. NPPF, Annex 2, Glossary, p. 71.

significance of a heritage asset is its value to this and future generations on account of its heritage interest. This may be archaeological, architectural, artistic or historic, and may derive from the asset itself or from its setting. The Planning Practice Guidance provides further explanation of these interests, and notes that the term “significance” encompasses both the “special architectural and historic interest” of listed buildings and the “national importance” of scheduled monuments²⁰.

5.9. Local planning authorities are required to take account of the following broad considerations in determining applications.

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness²¹.

5.10. In considering the impact of proposed development on designated heritage assets, “great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)”. This weight should be accorded

²⁰ CD1.2. PPG, 006 Reference ID: 18a-006-20190723.

²¹ CD1.1. NPPF, 192.

“irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm” to their significance²².

- 5.11. All harm to the significance of designated heritage assets requires “clear and convincing justification”²³.
- 5.12. The Framework distinguishes between “substantial harm” and “total loss”, and “less than substantial harm”²⁴. The Practice Guidance provides some assistance in distinguishing between “substantial” and “less than substantial” harm²⁵. The phrase “less than substantial harm” serves only the purpose of describing all harm that is not “substantial”. It therefore encompasses harm ranging from almost substantial to negligible. It is not a qualitative term, and the courts have established that “less than substantial harm” in the language of the Framework does not imply a “less than substantial objection” in the application of the Listed Buildings Act 1990. Any level of harm, from de minimis to substantial, should require “considerable importance and weight” to be given to the preservation of the designated heritage asset²⁶.
- 5.13. Substantial harm and total loss should be exceptional in respect of the majority of designated heritage assets, and wholly exceptional in respect of those of the highest significance²⁷. Proposals which would cause substantial harm or total loss should be refused, unless that harm or loss would be outweighed by substantial public benefit,

²² CD1.1. NPPF, 193.

²³ CD1.1. NPPF, 194.

²⁴ CD1.1. NPPF, 194-196.

²⁵ CD1.2. PPG, 018 Reference ID: 18a-018-20190723 and 019 Reference ID: 18a-019-20190723

²⁶ Blackpool Borough Council v Secretary of State for Communities and Local Government [2016] EWHC 1059 (Admin).

²⁷ CD1.1. NPPF, 194.

or four criteria can be met²⁸. In cases which would entail less than substantial harm that harm should be weighed against any public benefit which would arise when determining the application²⁹. The Practice Guidance provides an explanation of the meaning of “public benefit”; and this includes consideration of “heritage benefits”³⁰.

5.14. After considering harm to heritage assets, the Framework requires local planning authorities to look for opportunities for new development within conservation areas and the setting of heritage assets “to enhance or better reveal” their significance, while also noting that not all elements of a conservation area will necessarily contribute to its significance³¹.

5.15. The setting of a heritage asset is defined in the Framework as “the surroundings in which a heritage asset is experienced”³². The Practice Guidance provides some explanation of the nature of setting and the way in which setting may affect the significance of heritage assets³³.

5.16. The Framework’s policies for the conservation and enhancement of the significance of heritage assets form part of the holistic set of planning policies and complement them. For example, the policies for conservation support the distinctive character

²⁸ CD1.1. NPPF, 195.

²⁹ CD1.1. NPPF, 196.

³⁰ CD1.2. PPG, 020 Reference ID: 18a-020-20190723.

³¹ CD1.1. NPPF, 200 and 201. For consideration of setting see below.

³² CD1.1. NPPF, Glossary, p. 71.

³³ CD1.2. PPG, 013 Reference ID: 18a-013-20190723.

which contributes to the vitality of town centres³⁴. There is particular consonance between the policies for conservation and those for design³⁵.

5.17. The Framework states that good design enables the creation of better places in which people wish to live and work, and is therefore fundamental to the achievement of the planning system's objectives³⁶.

5.18. To secure this, the Framework requires that both local plans and development management should ensure that developments

a) will function well and add to the overall quality of the area, not just for the short term but over the life of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not discouraging appropriate innovation or change (such as increased densities);

d) establish and maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

³⁴ CD1.1. NPPF, 85, a.

³⁵ CD1.1. NPPF, section 12.

³⁶ CD1.1. NPPF, 124.

- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space), and support local facilities and transport networks; and*
- f) *create spaces that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*³⁷.

5.19. These requirements touch on the policies for the conservation of the historic environment at several points; and it may be observed that historic towns and other settlements often exemplify how they can be met.

5.20. The importance of good design is such that the Framework requires that “permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area”³⁸.

The Statutory Development Plan and Other Local Plan Documents

5.21. The statutory development plan for Norwich comprises the Joint Core Strategy for Broadland, Norwich and South Norfolk, adopted in 2011, the Norwich Development Management Policies Local Plan, adopted in 2014, and the Norwich Development Site Allocations Local Plan, also adopted in 2014. The development plan policies

³⁷ CD1.1. NPPF, 128.

³⁸ CD1.1. NPPF, 130.

and other planning documents relevant to this application have been set out by Norwich City Council in its Statement of Case³⁹.

5.22. The Joint Core Strategy includes policies relevant to the conservation of the historic environment. In requiring all development to be designed to the highest standard, it provides that all development should respect local distinctiveness, including, among other considerations, the historic environment and townscape, including the city of Norwich⁴⁰. The Strategy’s policy for Norwich City centre requires its enhancement, and the promotion of its role by means of a number of actions, of which the first is “enhancing the historic city, including its built, archaeological and environmental assets and its distinctive character as identified in conservation area appraisals, through innovative, sustainable design”⁴¹.

5.23. The policies of both the Framework and the Joint Core Strategy inform the Council’s Development Management Policies Plan⁴².

5.24. The Plan’s policy for sustainable development expects development, among other objectives, to “protect and enhance the physical, environmental and heritage assets of the city, and to safeguard the special visual and environmental qualities of Norwich...”. The Council affords equal weight to economic, environmental and social dimensions of sustainability. In the supporting text, it is noted that “Norwich

³⁹ CD11.1. NCC, Statement of Case, 2019, 7.2-7.7.

⁴⁰ CD2.2. JCS, policy 2

⁴¹ CD2.2. JCS, policy 11. The conservation areas have since been consolidated.

⁴² CD2.3. Norwich City Council, Development Management Policies Local Plan 2014 (henceforth “NCC DMPLP” in references). CD2.4. The Site Allocations and Site Specific Policies Local Plan 2014 contains no policies relating to Anglia Square.

will not benefit from badly designed, inappropriately located or poorly conceived proposals which clearly fail to deliver on sustainable development objectives”⁴³.

5.25. The Plan’s policy on design principles refers to views, character, height, scale and massing among other considerations. The design of new development should be informed by the “need to protect and enhance the significant long views of the major landmarks identified in appendix 8 and those identified in conservation area appraisals”⁴⁴. Design “must have regard to the character of the surrounding neighbourhood; and although the density of development may be higher within the city, district and local centres, density must still “take account of the need to enhance heritage assets and their settings”⁴⁵.

5.26. The policy encourages the development of “landmark buildings of exceptional quality” at the main “gateways” to the city, but the supporting text qualifies this position, noting that, while a landmark is defined as “a building or structure that stands out from its background by virtue of height, size or some other aspect of its design... because of the particularly sensitive townscape of the historic city it is considered that excessively tall or large buildings would be inappropriate in most gateway locations”. The text continues to explain that the “expectation of this policy is that the gateway sites would be marked by development of exceptionally high

⁴³ CD2.3. NCC DMPLP, policy DM1 (p.27) and paragraph 1.8 (p. 29).

⁴⁴ CD2.3. NCC DMPLP, policy 3, b (p. 35).

⁴⁵ CD2.3. NCC DMPLP, policy 3, c, e (p. 35 and 36).

quality which relies for its distinctiveness on design aspects other than size or height”⁴⁶.

- 5.27. The Plan’s policy for safeguarding Norwich’s heritage refers directly to the Framework for its policies in respect of designated heritage assets of national significance, and has no detailed policies in respect of these⁴⁷. The supporting text notes that the city contains 25 scheduled monuments and about 1,500 listed buildings; it was written before the consolidation of the conservation areas within the walled city into the single Norwich City Centre Conservation Area⁴⁸.
- 5.28. Anglia Square forms part of the Anglia Square / Magdalen Street “large district centre”. The Plan’s policy on retail, leisure and other main town centre uses is intended to support the city centre, the two large district centres and local centres, and is a continuation of an approach which has seen Norwich maintain the highest proportion of retail activity in its centre of any major city in the country⁴⁹. The text supporting the separate policy on city centre shopping notes the difficulty of planning for retail uses in the context of dynamic change in retailing⁵⁰.
- 5.29. Norwich City Council published a Policy Guidance Note titled Anglia Square and Surrounding Area in 2017. Informed by discussions with the landowner, Columbia Threadneedle, and their developer, Weston Homes, and by public consultation, the note provides non-statutory guidance for the comprehensive redevelopment of

⁴⁶ CD2.3. NCC DMPLP, policy DM3, a, and paragraph 3.6 (pp. 35 and 38).

⁴⁷ CD2.3. NCC DMPLP, policy DM9 and paragraph 9.3 (pp. 75 and 77).

⁴⁸ CD2.3. NCC DMPLP, paragraphs 9.4, 9.5, 9.7 (p. 77).

⁴⁹ CD2.3. NCC DMPLP, policy DM18 and paragraph 18.2 (pp. 123 and 124).

⁵⁰ CD2.3. NCC DMPLP, paragraph 20.6 (p. 139).

Anglia Square⁵¹. The Policy Guidance Note replaced the Northern City Centre Area Action Plan of 2010, which expired in 2016⁵². The note was produced “in response to the particular form and nature of development that has been proposed by the market, and expressly does not provide advice on the full range of development which the site could accommodate⁵³.”

5.30. The Policy Guidance Note is a comprehensive document; here I shall note those elements which concern the conservation of the historic environment most directly.

5.31. The Council’s vision for Anglia Square is of a development “with a distinctive identity that compliments the neighbouring area and reflects its location at the heart of the historic northern city centre”, with “a clear relationship in built form with the surrounding area”⁵⁴. Among the objectives for the development are that it should “help to preserve or enhance the historic character of the surrounding area and key views”⁵⁵.

5.32. The Policy Guidance Note refers to the importance of views identified both in the Development Management Policies Local Plan and the defunct Area Action Plan, and also, in view of the importance of design, states that independent design review of any proposals will be expected⁵⁶.

⁵¹ CD2.11. NCC, Anglia Square and surrounding area: Policy Guidance Note, March 2017 (henceforth “NCC PGN” in references, section 1.

⁵² CD2.11. NCC PGN, 2.1, p.6.

⁵³ CD2.11. NCC PGN, 2.2, p.6.

⁵⁴ CD2.11. NCC, PGN, 5.4, p. 16.

⁵⁵ CD2.11. NCC, PGN, 5.5, p. 17.

⁵⁶ CD2.11. NCC, PGN, 7.82, 7.84, p. 39.

- 5.33. As Anglia Square is noted as detracting from the character of the conservation area in the Norwich City Centre Conservation Area Appraisal, the Policy Guidance Note states that

The site provides an opportunity for significant enhancement to the character of the conservation area as well as to the setting of local heritage assets. The character area appraisal provides guidance for redevelopment of the site, including the need to respect the existing scale of development on Magdalen Street and St. Augustine's Street, and states that large scale buildings would be appropriate near the ring road⁵⁷.

- 5.34. The importance of scale is reiterated a few paragraphs later. “New development should be sensitive to the scale of existing buildings in its vicinity and must respect the setting of heritage assets”⁵⁸.

- 5.35. The Policy Guidance Note also draws attention to the opportunity to reinstate and improve views from the north of the site towards the city's major landmarks, to the potential impact of development on views from the surrounding city, and to the desirability of establishing views from within the proposed development to landmarks such as St. Augustine's Church⁵⁹.

- 5.36. As St. Augustine's Street and St. Crispin's roundabout have been identified in other local plan documents as among the main “gateways” to the city, the Policy Guidance Note provides guidance which complements the relevant Development Management

⁵⁷ CD2.11. NCC, PGN, 7.86, p. 40.

⁵⁸ CD2.11. NCC, PGN, 7.90, p. 42.

⁵⁹ CD2.11. NCC, PGN, 7.88, 7.89, p. 40.

Local Plan Policy and states that any development will be required to respond to the site's status as a gateway. The critical passage reads as follows.

The local plan identifies the main gateways to the city including at St. Augustine's Street and at St. Crispin's roundabout. Policy DM3 states that these may be appropriate locations for new landmark buildings of exceptional quality. There may be scope to provide a landmark building within the site, in order to reinforce the sense of place and make effective use of this highly sustainable urban site. A landmark building does not necessarily need to be a landmark as a result of its height and particular attention must be paid to such proposals in view of the highly sensitive townscape of the St. Augustine's area, which falls within the Northern City character area. Moreover the Anglia Square character area assessment within the conservation area appraisal states that taller buildings are likely to be more appropriate near the southern end of the site, adjacent to the St. Crispin's gateway. Any proposed tall buildings will need to be carefully designed, positioned and oriented to complement the historic streetscape and respect key views across the city centre from and through the site.⁶⁰

5.37. The Norwich City Centre Conservation Area Appraisal provides a clear account of the historical development of Norwich and a similarly clear analysis of the conservation area both as a whole and as divided into 13 character areas⁶¹. The Appraisal will be an important document in this inquiry; here I note a small number of relevant points.

⁶⁰ CD2.11. NCC, PGN, 7.91 and 7.92, pp. 41 and 42. The extract is from 7.91. It may be observed that the approach to landmarks diverges slightly from that of the relevant Development Management policy – see paragraph 5.27 and footnote 36 above.

⁶¹ CD2.10. NCC, pp. 31-34.

- 5.38. The Appraisal identifies six principal landmarks in Norwich. These are the castle, the medieval cathedral, the Roman Catholic cathedral, the clock tower of City Hall, St. Peter Mancroft and St. Giles’s Church. It notes that the majority of the city’s medieval churches and a number of other buildings serve as landmarks. Finally it notes that seven of the city’s taller modern buildings which are out of scale and have blocky silhouettes are negative landmarks⁶².
- 5.39. While many of the character areas are relevant to the inquiry, so far-reaching the effects of the proposed development would be, the Anglia Square character area is of course particularly relevant as a large part of it forms the proposed development site. The Appraisal summarises thus: “The area was subject to comprehensive redevelopment in the 1960s and ’70s and is one of very poor townscape quality which visually severs the northern housing areas from the rest of the historic central area”⁶³.
- 5.40. The Appraisal notes that the shopping centre and Sovereign House “obscure views of prominent city landmarks due to their bulk and height”. Although distinctive, these buildings and the multi-storey car park “have a negative impact on the character and appearance of the wider conservation area”⁶⁴.
- 5.41. The Appraisal includes general policies and guidance to protect the principal characteristics of the conservation area. The policies were drafted before the publication of the Framework, and their wording is not consistent with its approach,

⁶² CD2.10. NCC, CAA, p.17.

⁶³ CD2.10. NCC, CAA, p. 43.

⁶⁴ CD2.10. NCC, CAA, p. 44.

but they indicate an approach to the management of development within the conservation area consistent with the preservation and enhancement of its character. They include policies to protect and reinstate the pattern of streets and buildings lines, to protect views of citywide and local landmarks, to ensure the appropriate design of buildings⁶⁵.

- 5.42. For each character area the Appraisal provides policies for management and enhancement. For the Anglia Square character area these require any redevelopment of Anglia Square to respect the existing scale where it meets existing development on Magdalen Street; suggest that large-scale buildings would be appropriate near the ring road; require the reinstatement of the historic route between Magdalen Street and St. Augustine’s Street; and require the retention of the significant public space that is Anglia Square itself in the new development⁶⁶.

Published Advice

- 5.43. Historic England publishes extensive advice, notably in the series *Historic England Good Practice Advice in Planning*, which we publish in collaboration with the Historic Environment Forum, and the series of our own *Historic Environment Advice Notes*. A number are pertinent to this inquiry.
- 5.44. *Managing Significance in Decision-Taking in the Historic Environment* provides advice on both the general approach to decision-taking in this context and on a wide range of matters particular to the historic environment. It sets out a systematic approach

⁶⁵ CD2.10. NCC CAA, pp. 26-30.

⁶⁶ CD2.10. NCC, CAA, p. 48.

to understanding the significance of heritage assets, and considering both how to conserve that significance and how to assess the impact of proposals for development upon it⁶⁷. It also provides advice on the opportunities for enhancing the significance of both conservation areas and other designated heritage assets, and on the assessment of good design in historic contexts⁶⁸.

5.45. “Setting” is a concept introduced in the Listed Building Act, present in the Framework’s policies in respect of the conservation of the significance of heritage assets, and briefly explained in the Planning Practice Guidance⁶⁹. *The Setting of Heritage Assets* provides a comprehensive explanation of “setting” , considering questions such as its extent, and sets out a staged approach to understanding how proposals for development may affect the significance of heritage assets through their effect on those assets’ settings⁷⁰. This approach will inform much of the argument of this proof.

5.46. *Conservation Area Appraisal, Designation and Management* also provides a comprehensive survey of its subject, and is helpful in consideration significance , character and interest and in providing advice in respect of new design in conservation areas⁷¹.

⁶⁷ CD12.1. Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment 2015* (henceforth “Managing Significance” or “GPA 2” in references) – pp 2-11.

⁶⁸ CD12.1. Historic England, *GPA 2*, p.15.

⁶⁹ See above, paragraph 5.15, p. 23.

⁷⁰ CD11.18. Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets 2015* (henceforth “The Setting of Heritage Assets” or “HE GPA 3” in references).

⁷¹ CD13.1. Historic England *Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management 2019* (henceforth “HEAN 1” in references).

5.47. *Tall Buildings* provides advice on how to assess proposals for tall buildings in historic contexts⁷². The definition of what is a tall building will depend on the building's relation to its surroundings⁷³. It deals with both plan-making and development management. It emphasises the importance of the plan: "In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications"⁷⁴. Among the benefits of considering tall buildings in plan-making is that of "Maintaining protection of the setting of any designated heritage assets and the overall historic character that makes a city or area distinctive or special"⁷⁵.

5.48. In respect of development management, *Tall Buildings* sets out how to approach developing proposals for tall buildings and how to assess them, and notes that should a proposal cause harm to the historic environment local planning authorities are unlikely to find clear and convincing justification for that harm without careful assessment of both such public benefits as the development would provide and alternative means of providing them⁷⁶.

5.49. Historic England's own advice is informed by *Conservation Principles*, which provides an approach to offering guidance on and making decisions about the management

⁷² CD11.19. Historic England Advice Note 4 – Tall Buildings, 2015 (henceforth "Tall Buildings" or "HEAN 4" in references).

⁷³ CD11.19. HEAN 4 – p. 2.

⁷⁴ CD11.19. HEAN 4 – p. 4.

⁷⁵ CD11.19. HEAN 4 – p. 5.

⁷⁶ CD11.19. HEAN 4 – p. 10.

of the historic environment⁷⁷. While it is not necessary to cite this extensively, its approach underlies this proof.

⁷⁷ CD12.2. HE (then English Heritage), Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment, 2008.

6. NORWICH – HISTORY AND SIGNIFICANCE OF THE CITY

Introduction

- 6.1. The scale of the proposed redevelopment of Anglia Square is such that its impact would be felt across the historic city. As the starting point for any assessment of the impact of a development on the significance of a historic site, building or place must be understanding that significance, it follows that the significance of the historic city, and the spaces, monuments and buildings of which it is composed, must be assessed, at least selectively, before the impact of the proposed redevelopment can be gauged⁷⁸.
- 6.2. Here I shall provide a general account of Norwich and its significance, paying particular attention to those aspects of the city which would be most affected by the proposed redevelopment of Anglia Square. It will open with consideration of the origins and historical development of the city, before turning to a topographical exploration of first the heart of the city south of the Wensum and then of “Norwich across the water”. Analysis of the significance of the city’s great monuments and more important buildings, and of the contribution of setting to that significance, will be interspersed through these parts of this section of my proof. The section will then close with an analysis of the city and its character and significance from three perspectives: the environs of Anglia Square, the intimacy of the city, and the image of

⁷⁸ CD1.1. NPPF, 190; CD1.2. PPG, 007 Reference ID: 18a-007-20190723; this section of my proof corresponds to the first and second of the five steps recommended in CD11.18. HE GPA 3, pp. 9 - 12.

the city. These will provide a structure through which I shall consider the impact of the proposals on the significance of the affected designated heritage assets in section eight of the proof.

- 6.3. The impact of the proposed development would be upon Norwich as a historic city and upon many of the historic monuments, structures and buildings within it. The decision-maker must be concerned with the character and appearance of the conservation area, the special interest of the listed building and the national importance of the scheduled monuments. In practice these things are intertwined, and this is reflected in the approach taken to the analysis of significance, and subsequently impact, in this proof. I have taken the Norwich City Centre Conservation Area to represent the historic city of Norwich, and as we are concerned with the impact of the proposed redevelopment of Anglia Square on the historic city, I have referred to “Norwich”, “the city” and the conservation area interchangeably. The former terms should not be taken, therefore, to describe the entire modern city.
- 6.4. Norwich is one of England’s – and Europe’s – great historic cities. It is a place of exceptional significance, archaeological, architectural, artistic and historic. Among its monuments and buildings the Norman castle and the cathedral are themselves of outstanding importance; but the city is astonishingly rich in historic buildings of great interest, giving form to a pattern of streets and spaces deriving ultimately from the city’s Saxon and Norman origins. Articulated by the great mass of the medieval cathedral, crowned by its spire, by the castle upon its artificial mound, by the clock tower of the 20th century City Hall, the tower of the 19th century Catholic cathedral

and the towers of the city’s numerous medieval churches, Norwich may reasonably be described as a collective work of art one thousand years in the making.

Historical Origins and the Medieval City

- 6.5. Norwich was a Saxon settlement⁷⁹. Already substantial by the 8th century, the settlement had both a fortified burgh and a mint by the later part of the 10th, when the name *Norwic* is first recorded. In the 11th century Norwich was the third largest eastern port in England, after London and York. The Domesday Survey suggests that the town had a population of about 7,500, served by up to 40 churches and chapels.
- 6.6. Conquest was followed by the radical re-working of the Saxon settlement by its Norman masters. Nearly a hundred houses were cleared to make way for the castle; the Saxon market at Tombland was replaced by a new market on the site of the present marketplace; and Conesford, part of the Saxon settlement, was cleared for the cathedral close. The Norman re-working of Saxon Norwich established much of the essential form of the heart of the city today.

The Norman Castle

- 6.7. The castle is among the finest of Norman castles. It was at Norwich that William I built his only East Anglian castle, but this was probably a timber structure. It was quickly replaced, the present motte being raised by about 1100 and the stone keep

⁷⁹ The following account is taken largely from BoE, CD2.10, NCC CAA and relevant list descriptions. Designation descriptions are included in CgMs, Built Heritage Statement, March 2018, Appendix A (unpaginated)(henceforth “CGMS”). I have provided links to the National Heritage List of England (henceforth “NHLE” in references) for some designated heritage assets.

begun either soon after that or by about 1120. Nearly as large as the White Tower (the Tower of London), the keep is a “hall-keep” whose form and plan derive from those of other royal castles, notably the White Tower (1079) and Colchester (1083), and from castles in Normandy. The entire keep is faced with tiers of blank arcading, of slightly irregular pattern and simple character; the original portal at the entrance to the castle, at the level of the hall, is richly decorated. There is no parallel for the decorative treatment of the elevations of this fortress either in its English predecessors or in France; but Norwich influenced the construction and decoration of Castle Rising, to the west of Norwich, begun after 1138.

6.8. The keep is the only element of the medieval buildings of the castle to survive, and has been much altered in the course of nine centuries, during which it has passed from royal stronghold to prison to public museum. The castle was remodelled by both Sir John Soane and William Wilkins but the most relevant works are the re-facing of the keep by Anthony Salvin in 1835-8 – in which the Norman pattern of decoration was faithfully reproduced, the reconstruction of the prison and addition of the great gatehouse by William Wilkins or Francis Stone in the 1820s, and the transformation of the whole into an art gallery and museum after 1887 by Edward Boardman.

6.9. The castle is of exceptional, indeed European, significance. It has exceptional archaeological interest, both in the standing fabric of the keep and in the extensive surviving earthworks, and associated archaeological remains of other structures. It has exceptional architectural interest, as a monumental defensive structure of the

early to mid-11th century, and one whose architectural character is unique. It has artistic interest, on account of the composition of its elevations and the sculptural decoration of its portal. It has exceptional historical interest, as a monument of Norman England, expressive of conquest even if not contemporary with it, and further historic interest on account of its later, complex history. It also has communal value, as an emblem of Norwich, colloquially known as “the box on the hill” – although others may speak to this.

- 6.10. The castle’s setting is fundamental to its significance⁸⁰. The castle stands on its raised motte at the northern extremity of a ridge running north along Ber Street, which is itself an outlier of the high ground which occupies the south-west of the city. From here it commands the valley of the Wensum, looking across to the rising ground to the river’s north and east. “Command” is used here literally as well as figuratively, as the castle’s position is strategic as befits its military purpose⁸¹.
- 6.11. The castle’s dominant position is made very clear in maps of the city’s topography. It is equally clear from the views obtained from the castle itself, and from the views from across the city and from the surrounding heights to the keep⁸². The views from the castle take in not only the city itself, but the landscape beyond, with its wooded ridges; and the survival of these views means that despite the transformation of

⁸⁰ CD11.18. GPA 3, step 2, provides a checklist of potential attributes of setting which may contribute to significance: in many cases multiple attributes will be relevant; I shall highlight the most pertinent in the following assessment; the attributes cited will contribute positively to significance unless the contrary is indicated.

⁸¹ CD11.18. GPA 3, step 2, attributes: topography; functional relationships and communications; views from, towards, through, across and including the asset; intentional intervisibility with other historic and natural features; visual dominance, prominence or role as a focal point.

⁸² For topography see the map in CD2.10, NCC CAA, p. 4; CD11.18. HE GPA 3, step 2, attributes: visual dominance.

Norwich since the 11th century it is still possible to experience something of the castle's dominance not just of a small medieval city but of an extended landscape⁸³.

From numerous points within the city one can see the castle crowning the cityscape; and from vantage points beyond one can look across the city and see the castle dominating cityscape and valley. Example are the views from Magdalen Street within the city or from St, James Hill⁸⁴.

- 6.12. The castle buildings are listed at grade I⁸⁵. The motte and surviving earthworks are designated as a scheduled monument⁸⁶.

The Medieval Cathedral

- 6.13. The Cathedral of the Holy and Undivided Trinity at Norwich is one of the great buildings of England. After the Norman Conquest the bishopric of East Anglia was moved from North Elmham, first to Thetford and then to Norwich. The construction of the cathedral was begun by Herbert de Losinga, preparatory work perhaps beginning before the laying of the foundation stone, recorded as being in 1096. It was completed under de Losinga's successor, Bishop Eborard, who retired to Normandy in 1145. The building of cathedral, cloister, conventual buildings and bishop's palace was complete within 50 years.

⁸³ CD2.10. The importance of these views to the city's character is noted in NCC CAA, p. 4; CD11.18. HE GPA 3, step 2, attributes: views from, towards, through, across and including the asset, visual dominance, prominence or role as focal point.

⁸⁴ See, for example, HE 1/6 Appendix 5: *Views of Norwich*, ; CD11.18. HE GPA 3, step 2, attributes: surrounding landscape or townscape character.

⁸⁵ National Heritage List for England (henceforth "NHLE") - <https://historicengland.org.uk/listing/the-list/list-entry/1372724> - accessed 10.09.2019. Buildings listed at grade I are of exceptional interest: only 2.5% of approximately 500,000 listed buildings are listed at this grade.

⁸⁶ NHLE - <https://historicengland.org.uk/listing/the-list/list-entry/1004054> - accessed 10.09.2019. Scheduled monuments are nationally important archaeological sites: almost 20,000 such sites are designated in this way.

- 6.14. Although the relative poverty of the diocese meant that the cathedral did not undergo the extensive remodelling which took place at many English cathedrals in the later middle ages, fire, civil disorder and storm all necessitated significant works throughout the period, and some . The cloister was rebuilt between 1297 and 1430, following damage caused by a riot in 1272. The spire added in the 13th century was thrown down by a storm in 1362, damaging the clerestory of the east arm. The clerestory was rebuilt in the Perpendicular style. The Norman gallery and clerestory of nave and transepts were both heightened and re-fenestrated in the 14th century. Fire in 1463 led to the decision to build a vault over the nave; and the transepts and east arm were subsequently also vaulted. Bishop Goldwell (1472-99) remodelled the arcades of the east arm and was responsible for the erection of the spire. This list is not exhaustive.
- 6.15. Restorations were carried out by William Wilkins in the early 19th century, Anthony Salvin in the 1830s, and John H. Brown in the later 19th century. A new axial chapel was added by Sir Charles Nicholson in 1930-2.
- 6.16. The ground plan of the Norman cathedral survives almost entire. The long aisled nave of 14 bays leads to an aisled east arm and aisleless transepts all of four bays. The east arm terminates in St. Saviour's Chapel, the 20th century axial chapel, with, to either side, a two-storey chapel of complex shape, a device characteristic of Anglo-Norman cathedrals. The north transept retains its apsed eastern chapel; that to the

south transept, was lost in the later medieval period, while a rectangular chapel was added in the 13th century.

- 6.17. Notwithstanding the survival of the cathedral's plan, the character of both its interior and, most pertinently in this context, its exterior, reflect later changes some of which have been noted above.
- 6.18. The nave retains much of its Romanesque character, on account of the survival of the fourteen bays of its arcaded elevations, notable for their composition and little altered to support the rich rib vault which replaced the original wooden ceiling in the late 15th century, the other pre-eminent element of the space. In the two aisleless transepts the rich treatment of the Romanesque clerestory can be best appreciated, although partially obscured by the lierne vaults built in the early 16th century after a further fire. The east arm is the part of the cathedral's interior where later alterations are most evident. While its Norman origins remain clear, successive re-workings greatly changed the character of the space. Of these the reconstruction of the clerestory after the spire's collapse in 1362 was the most radical. The late 14th century clerestory is much taller than its Norman predecessor, and accounts for the impression of height. In turn this is crowned by lierne vault built in c. 1480-90, in place of a timber ceiling.
- 6.19. The elevations of the nave and transepts are a palimpsest of Norman and later medieval work. The great window of the west front was inserted in the second half of the 15th century. The west front itself lost much of its original character in the course

of 18th and 19th century restorations, particularly that carried out by John H. Brown in the 1870s-80s.

- 6.20. The Norman tower, completed towards the end of the building's construction, and one of the few towers of its date not to have suffered a major failure, rises high above the city, and is decorated with a pattern of roundels, lozenges, blind arcading and mouldings of such boldness that they can be seen from great distances. It is terminated by very tall turrets at its corners. These answered a series of turrets which would have animated the cathedral's roofscape in a dramatic manner: those of the transepts survive, truncated since the 18th century, and those of the west front have been lost. Since the late 15th century the tower has been crowned by the stone spire, rising to 315 feet and, in England, second only to the spire of Salisbury.
- 6.21. The cathedral is of exceptional significance, and indeed is a building of European importance. It has exceptional archaeological interest, the fabric preserving the record of its complex history. It has exceptional architectural and artistic interest. All phases of the building's medieval development contribute to this, but its especial significance is due to the completeness of the Norman building. Pevsner and Wilson note that the cathedral "remains one of the most complete major Romanesque buildings in Europe", despite its later alterations⁸⁷. It is of exceptional historic interest, embodying the political and religious history of England as experienced in one city and its hinterland. It may also be considered to have communal value of a high order – again, to which others may speak.

⁸⁷ BoE, p. 188. I have made no reference to the furnishings and monuments which add further to the building's architectural and artistic interest.

- 6.22. The cathedral’s significance is complex. The exceptional significance described above can be attributed to or found in numerous elements or aspects of the building. Tower and spire alone would form an exceptional work of architecture, for example, while the interior alone also forms a compelling work of architecture and art. The cathedral’s setting makes a fundamental contribution to its significance, both architectural and artistic, and historical.
- 6.23. The Close forms a precinct within the city, walled and gated, rich in medieval and later buildings in its western parts, themselves of great beauty and interest, which define the spaces of the Upper and Lower Close; while to the east are the playing fields. The Close affords numerous fine views of the cathedral, mostly partially obscured by the surrounding buildings, but sometimes, as from the east, revealing its full presence. Both the Close’s historic role as the cathedral’s precinct, and the admirable interplay of its buildings and spaces with the cathedral add greatly to one’s appreciation of the latter’s significance⁸⁸.
- 6.24. The most dramatic views of the cathedral are those from the playing fields beside the Wensum, in the eastern part of the Close and from the hills to the east. The former is a quintessentially English view of the cathedral rising above what would once have

⁸⁸ CD11.18. HE GPA 3, step 2, attributes – aspect; other heritage assets; definition, scale and “grain” of surrounding streetscape, landscape and spaces; green spaces, trees and vegetation; openness, enclosure and boundaries; functional relationships; history and degree of change over time; views to, through, across and including the asset; intentional visibility with other historic and natural features; visual dominance, prominence or role as focal point; sense of seclusion, intimacy or privacy.

been meadows⁸⁹. From both vantage points, however, one can appreciate the vast scale of the building, the tremendous vertical accent of tower and spire, the audaciousness of the tower’s decoration, the richness of the apsed east arm and its encircling chapels, the loftiness of the east arm’s clerestory and the drama of the flying buttresses supporting its vault; and from both vantage points the effect is exhilarating.

6.25. Although set low beside the River Wensum, the cathedral is a monumental presence in the cityscape of Norwich, its presence extending far beyond the confines of the Close; and it acts, with the castle, as one of the twin poles around which the city is arrayed. The cathedral’s spire can be seen from innumerable vantage points across the historic city and indeed from approaches to the city from what are now its suburbs⁹⁰. (An example of the latter is the view from Aylsham Road⁹¹.)

6.26. Perhaps the most remarkable views of the cathedral are those from the heights to the east of the Wensum. From the Mottram Monument on St. James Hill and the Armada Beacon on Ketts Heights, one can look across the river valley and see the cathedral at the heart of medieval Norwich, between the expansive fields of the close and the dense pattern of spaces, streets and buildings on either side of the river. The rising ground to the south-west forms its backdrop, with the castle overlooking the

⁸⁹ CD11.18. HE GPA 3, step 2, attributes: other heritage assets (including buildings, structures, landscapes, areas or archaeological remains); definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces; green space, trees and vegetation; surrounding landscape or townscape character; views from, towards, through, across and including the asset; visual dominance, prominence or role as focal point; sense of enclosure, seclusion, intimacy or privacy.

⁹⁰ CD11.18. HE GPA 3, step 2, attributes: views from, towards, through, across and including the asset; visual dominance, prominence or role as focal point.

⁹¹ CD7.81.SEI (t), Cityscape Digital, Compendium of Views, revision A, August 2018 (henceforth, in references, “Compendium of Views”), view 49.

city from its promontory, and City Hall and the catholic cathedral also rising above the surrounding cityscape, the latter further articulated by the repeating presence formed by the towers of many of the city’s medieval churches. The scale of the cathedral always surprises, but does so especially when it is caught by the light. It rises like a model of itself before the viewer, an extraordinary work of architecture, an extraordinary historic monument, but also an essential part of the organic whole which is the historic and contemporary city of Norwich⁹².

6.27. The cathedral’s pre-eminence within Norwich and within the enclosed landscape of this part of the Wensum valley is not accidental. Medieval cathedrals were the greatest buildings of their age, and characteristically rose above their cities – and often the surrounding landscape – as symbols of spiritual – and temporal – power. Consider English examples, such as Durham, Lincoln or St Albans, whose raised sites, combined with their scale, allow them to dominate their cities and, in the case of Lincoln and St. Albans, to be visible over large expanses of countryside. Salisbury, like Norwich, stands beside water meadows; and its scale and spire make the cathedral a landmark over a wide area.

6.28. Norwich cathedral’s pre-eminence is reflected not only in the contemporary experience of the cathedral’s place in the modern city, but also in numerous historic representations of Norwich. Such paintings both show how artists and their patron’s saw Norwich and helped shape our appreciation of the city and its monuments

⁹² CD11.18. HE GPA 3, step 2, attributes: topography; other heritage assets; definition, scale and “grain” of surrounding streetscape, landscape and spaces; green spaces, trees and vegetation; functional relationships; views from, towards, through, across and including the asset; visual dominance, prominence or role as focal point; celebrated artistic representations.

today. I have provided a selection of views from the 18th to the 20th centuries in Appendix 3⁹³.

6.29. It follows that the cathedral's setting is integral to its significance and fundamental to our appreciation of that significance⁹⁴.

6.30. The Cathedral of the Holy and Undivided Trinity is listed at grade I⁹⁵.

The City Walls

6.31. With the re-planning of Norwich, the construction of the castle and its keep, and the establishment of the Close and the construction of the cathedral, the Normans set the pattern for the development for the city throughout the medieval period. Norwich prospered; its market grew; and 130 trades were recorded in the city by the early 14th century. Between 1297 and 1334 walls were built for the city's defence. The population rose to between 10,000 and 15,000 by the mid-14th century.

6.32. The area of the walled city was the largest of any English town or city, including London. Norwich's walls enclosed not only the built up area of the city, but eight religious houses and much open ground. Constructed of flint rubble, the walls rose to up to four metres, included up to 40 towers, among them a pair of boom towers on the river, and were penetrated by 12 gates. The city's continuing growth did not

⁹³ See HE1/4 Appendix 3: Artistic Representations of Norwich.

⁹⁴ CD11.18. HE GPA 3, step 2, attributes: topography; other heritage assets; formal design, e.g. hierarchy; views from, towards, through, across and including asset; visual dominance, prominence or role as focal point; cultural associations; celebrated artistic representations.

⁹⁵ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1051330>; BoE, pp. 188-215.

expand significantly beyond this area until the mid-19th century. Between 1791 and 1810, however, the gates were all demolished to improve access⁹⁶.

- 6.33. Extensive sections of Norwich’s medieval walls survive, mostly in ruinous condition. Taken together these are of very high significance. Given the general destruction of city and town walls as they became both unnecessary and an impediment to development, extensive survival is comparatively rare⁹⁷. The walls are of archaeological interest as the remaining physical evidence of what was a substantial work of defensive engineering. They are of architectural interest, both as structures – particularly those parts which are best preserved – and for their contribution to the cityscape. They are of historical interest as the remains of the most extensive civic defences of medieval England, illustrative of the prosperity and ambition of the city in the 13th century.
- 6.34. The setting of the surviving sections of Norwich’s walls greatly affects one’s ability to appreciate their significance⁹⁸. The extensive but much ruined sections of wall beside the Chapelfield Road section of the A147 and the Chapelfields shopping centre are difficult to appreciate because of their unfortunate position between a major road and modern development which relates poorly to them. The significance of the very well-preserved section of wall on Carrow Hill, which includes a tower, at which point the wall then turns sharply and falls through steep woodland, can be appreciated much more readily, in part due to its condition, but also because it is set

⁹⁶ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1004023>

⁹⁷ Regionally, extensive parts of the walls of Great Yarmouth survive, as do extensive sections of the Roman walls of Colchester. The walls of King’s Lynn (another exceptionally extensive set) have been almost wholly lost.

⁹⁸ CD11.18. See HE GPA 3, paragraph 9, p. 4 for the role of setting in the appreciation of significance.

partly in a historic context and partly in woodland. The former reinforces its historic character, while the latter lends it that picturesque character which was so important to the growth of interest in and appreciation for historic monuments in the 18th and 19th centuries, and remains potent today⁹⁹. The short section of the walls on Magpie Road which would be most directly affected by the proposed development can be similarly appreciated. It survives almost to full height, with a bastion; its presence is strengthened by the framing effect of the adjacent houses; and above the wall one can see the cathedral's spire¹⁰⁰.

- 6.35. The surviving walls are designated as a scheduled monument. The surviving sections, and the circuit itself, make an important contribution to the character of the city centre conservation area.

From the Medieval City to the Contemporary City

- 6.36. Within what was the circuit of the walls, Norwich grew into a city of rich character in the course of the nine centuries which have elapsed since the Norman Conquest. That character survived the vicissitudes of the 20th century to a remarkable degree.
- 6.37. In addition to castle, cathedral and walls, much of medieval Norwich survives. The pattern of the city's development within the walls is due in large part to its medieval

⁹⁹ CD11.18. HE GPA 3, step 2, attributes: other heritage asset; definition of scale and "grain" of surrounding streetscape, landscape and spaces; surrounding landscape or townscape character. The picturesque is one form of fortuitous architectural or historic interest: architectural and artistic interest: see CD1.2. PPG 006 Reference ID: 18a-006-20190723: "These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved".

¹⁰⁰ CD7.81 SEI (t). Compendium of Views, view 17. CD11.18, HE GPA 3, step 2, attributes: definition, scale and 'grain' of surrounding streetscape, landscape and spaces; sense of enclosure, seclusion, intimacy or privacy.

development. The city's 35 churches are medieval, and many medieval buildings survive, often concealed beneath later work¹⁰¹. The post-medieval period brought significant changes to the city, both with the dissolution of religious houses (which had occupied considerable portions of the city) and with the arrival of "strangers" from the continent, and the transformation of trade which they effected. Prosperity in the later 17th and 18th centuries is reflected in the wealth of houses either built or remodelled in this period, and also, as already noted, the destruction of the city gates. Continued commercial growth in the 19th century led to the construction of factories, and rising population the spread of the city beyond the line of the walls, as well as increasing over-crowding within it. The century ended with the construction of a Roman Catholic parish church of a scale appropriate to its later designation as a cathedral.

6.38. The 20th century saw the construction of the last of Norwich's great landmarks, City Hall. Extensive clearances of what were then dense and unhealthy parts of the historic city in the first half of the century was followed by an ambitious programme of public housing in the second. The latter half of the century saw a considerable amount of redevelopment within the historic city.

¹⁰¹ The number of churches is that given in BoE, p. 230.

Tombland and Elm Hill

- 6.39. To the west of the cathedral close is Tombland. The site of the Saxon market, this is an irregular space, lined with varied and interesting buildings. It is one of the finest of a series of spaces which contribute to Norwich’s exceptional character¹⁰².
- 6.40. On its western side are the two principal gates to the Close. St. Ethelbert’s Gate dates from c. 1316-20 and the Erpingham Gate from 1416-25. Both have high archaeological, architectural and historic interest, and both are listed at grade I and designated as scheduled monuments¹⁰³. Given their function as gateways, their setting is fundamental to their significance, but beyond this functional consideration, their setting, whether from within the Close or from Tombland contributes greatly to the appreciation of their significance. The two gates’ formal architecture is set off by the varied character of the buildings which define Tombland, whether the 18th century houses which define its south side or the often earlier houses on its east side – for example, number 14, a timber-framed house built in the mid-16th century for Augustine Steward, and altered in the later 16th and 17th centuries and after, or the earlier Louis Marchesi, a late 15th century house¹⁰⁴.
- 6.41. Almost nothing detracts from the historic character of Tombland, and the space itself, the relationship between the buildings and that with the wider cityscape all

¹⁰² CD2.10. NCC CAA. Tombland forms part of character area 6, Elm Hill and Maddermarket. It is described as “very attractive, and potentially the best space in the city”. See p. 79.

¹⁰³ <https://historicengland.org.uk/listing/the-list/list-entry/1004028> and <https://historicengland.org.uk/listing/the-list/list-entry/1372788>

¹⁰⁴ Both are listed at grade II*; nearly all the buildings which line Tombland are listed: CD2.10, NCC CAA, p. 83, Elm Hill and Maddermarket Buildings Map.

contribute to the character of the place and to the significance of the individual buildings¹⁰⁵. From Tombland Wensum Street, lined with pleasant buildings and opening to the churchyard of St Simon and St. Jude at the entrance to Elm Hill, leads down to the river and to the northern part of the historic city beyond Fye Bridge.

6.42. From Tombland an area of narrow streets extends westwards, whose historic character has been little altered by modern developments. Arranged on an irregular grid, the north-west streets falling towards the river they are lined with medieval and later buildings. Many are timber-framed, generally now plastered or fronted with brick, but their age often evident in their jettied frontages. The area around Elm Hill is especially remarkable for the character of its streetscapes, the scale and pattern of the buildings varied but not discordant, the materials of buildings and streets – timber, brick, plaster, tile, cobbles – rich but complementary. These characteristics are to be found throughout the Elm Hill and Maddermarket area, albeit not with uniform intensity.

6.43. The intimacy of the streets is set off by the presence of medieval churches and by the major landmarks of the city beyond. Among the churches are St. Peter, Hungate, St. George, Tombland, St. Gregory, Pottergate and St. Andrew's, St. Andrew's Street, several themselves modest, St. Andrew's second in size only to St. Peter Mancroft. St. Andrew's Hall, built between 1440 and 1470, is remarkable both on account of its scale and because it is the only intact friars' church in England.

¹⁰⁵ CD11.18. GPA 3, step 2, attributes: other heritage assets; definition, scale and "grain" of surrounding streetscape, landscape and spaces; trees; openness, enclosure and boundaries; functional relationships; history and degree of change over time; surrounding landscape or townscape character; views from, towards, through, across and including the asset; role as a focal point.

- 6.44. St. Peter Hungate stands on Elm Hill. It is a small church dating largely from the 15th century. Its tower was built in c. 1431. The church is listed at grade I. In addition to the interests intrinsic to the building itself, it draws significance from its setting in an exceptionally unaltered streetscape¹⁰⁶. So too, in varying degrees, do all the churches mentioned in the preceding paragraph.
- 6.45. As the churches' towers articulate the streetscape of this area itself, so do some, at least of the city's great monuments. Of these the clock tower of City Hall is the most important, but there are also views to the castle and cathedral spire¹⁰⁷.
- 6.46. The numerous historic buildings of this area are rich in all the interests which make up significance, and a large number are listed. For the purposes of this proof, however, what is of greatest importance is the character of the area. The Conservation Area Appraisal's classification of the significance of the area is "very high" in respect of the area's concentration of historic buildings, presence of features from historical periods, townscape and landscape quality and quality of details; while it notes the presence of very few negative features¹⁰⁸. This area of Norwich comprises a remarkably rich and well-preserved historic cityscape. The area's medieval character can still be understood and felt, while its later development in the 16th and 17th centuries and the Georgian and Victorian periods has in turn added to and intensified its character.

¹⁰⁶ CD7.81 SEI (t). Compendium of Views, 22. CD11.18. HE GPA 3, step 2, attributes: other heritage assets; definition, scale and "grain" of surrounding streetscape, landscape and spaces; surrounding landscape and townscape character.

¹⁰⁷ CD2.10. NCC CAA, p. 76.

¹⁰⁸ CD2.10. NCC CAA, p. 75.

- 6.47. Elm Hill is particularly characterful. Its survival is due to an early campaign against clearance led by the Norwich Society in the 1930s, and it is with good reason that images of Elm Hill are often used to publicise Norwich’s history and beauty¹⁰⁹.
- 6.48. That character, in which the significance of the area resides, is largely due to the pattern and composition of the area itself. Its setting, however, also contributes. The views to the city’s landmarks noted above, connect the area to the rest of the city in both space and time. The landmarks orientate, but they also provide meaning: they convey a sense of the city’s history, and of the hierarchy of its development; and they have resonance¹¹⁰. At the same time, many of the views through and beyond the area contain little or nothing which undermines the character of the area itself.

The Market Place and Norwich City Hall

- 6.49. The narrow streets of the Elm Hill and Maddermarket area give way to the Market Place. Topography, scale and the character of the surrounding buildings lend the square particular drama¹¹¹.
- 6.50. The earliest of the square’s three major buildings is the Guildhall, built in 1407-13, enlarged in the 1530s, and altered at various times since, notably by the addition of the clock turret in 1850. It is constructed of knapped flint and rather flamboyant

¹⁰⁹ BoE, p. 295.

¹¹⁰ CD11.18. GPA 3, step 2, attributes: topography; other heritage assets; definition, scale and “grain” of surrounding streetscape, landscape and spaces; hierarchy; views from, towards, through, across and including the asset; visual dominance, prominence or role as a focal point.

¹¹¹ The Market Place forms part of the Civic character area in the conservation area appraisal, which is classed as being of high significance: CD2.10. NCC CAA, pp.123-130.

flushwork, very characteristically East Anglian materials. It is listed at grade I, and is of very high archaeological, architectural and historic interest. The seat of the city's government for several hundred years, its setting in the city's greatest civic space contributes much to the appreciation of its significance¹¹².

6.51. The building which commands the Market Square dates only from the 20th century. The decision of the corporation to commission new offices resulted in what Pevsner and Wilson consider to be the “foremost English public building of between the wars”¹¹³. City Hall, designed in 1931 by C. H. James and S. R. Pierce and built in 1937-38, was the first English public building to be designed in a style influenced by contemporary Swedish neo-classicism. Elevated on a terrace above the Market Square, high on the ridge which rises above the Wensum's valley, the austere but palatial frontage of the building is set off by the attached clock tower, which rises, with its copper lantern, to 185 feet.

6.52. City Hall is listed at grade II*, on account of the high interest of its architecture, including both exterior and interior, the quality of features such as the bronze lions which guard the entrance, its place in architectural history and its effectiveness as a landmark. Setting contributes considerably to its significance: the building commands the Market Place and faces the castle directly; the clock tower can be seen from across the city and makes City Hall one of Norwich's great landmarks; and

¹¹² CD11.18. GPA 3, step 2, attributes: topography; other heritage assets; surrounding landscape or townscape character.

¹¹³ BoE, p. 262; <https://historicengland.org.uk/listing/the-list/list-entry/1210484>.

the entire building can be seen overlooking the heart of the city in the views from the heights to the east¹¹⁴.

The Churches of St. Peter and St. Giles

- 6.53. Among the medieval churches two stand out as landmarks across the city¹¹⁵. St. Peter Mancroft was built between 1430 and 1455 in an elevated position above the market, opposite the Guildhall. The largest of Norwich’s churches, it has been described as “the Norfolk parish church par excellence”¹¹⁶. A sumptuous Perpendicular building, its richly decorated tower rises to 146 feet. St. Peter’s remains the civic church of the city. St. Giles was built in the late 14th century, although its chancel was rebuilt in the 19th. It stands on the ridge running west above the Wensum, and its tower, which rises to 120 feet, is prominent across the city.
- 6.54. St. Peter’s and St. Giles’ Churches are both listed at grade I¹¹⁷. Both are very high in the interests which comprise significance; and for both setting makes an important contribution to their significance. In views of St. Peter’s from the Market Place and of St. Giles’ along St. Giles Street, for example, they form impressive and beautiful monuments, their architectural composition evident to powerful effect. Their towers rise above the cityscape and are visible from across and beyond the city¹¹⁸.

¹¹⁴ CD2.10. NCC CAA, p. 17. CD11.18. HE GPA 3, step 2, attributes: topography; other heritage assets; formal design, e.g. hierarchy, layout; orientation and aspect; views from, towards, through, across and including asset; visual dominance, prominence or role as focal point.

¹¹⁵ CD2.10. NCC, CAA, p. 17.

¹¹⁶ BoE, p. 247.

¹¹⁷ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1210490> and <https://historicengland.org.uk/listing/the-list/list-entry/1051876>

¹¹⁸ CD2.10. NCC CAA, pp. 17, 102 and 124; CD11.18. GPA 3, step 2: topography; other heritage assets; surrounding landscape or townscape character; views from, towards, through, across and including the asset.

6.55. St. Giles stands in St. Giles Street, and gives its name to one of the character areas identified by the conservation area appraisal. It is accorded high significance for concentration of historic buildings, presence of features from historical periods and quality of details, very high significance for townscape and landscape quality, and has few negative features.

The 19th Century Cathedral

6.56. Beyond St. Giles, and conspicuous in its setting, is what is now the Roman Catholic Cathedral Church of St. John. St. John's was built, just outside the circuit of the medieval walls, for the 15th Duke of Norfolk, as a parish church. Begun in 1882 and completed in 1910, it was the work of George Gilbert Scott junior and John Oldrid Scott, and is a masterly essay in the Early English style. Its scale made it fit to be a cathedral, which it became in 1976; and its scale and placing combined to make it at once one of Norwich's major landmarks¹¹⁹.

6.57. The cathedral is listed at grade 1¹²⁰. It is of very high architectural interest as a major work of the Gothic Revival, and of similar historical interest as a monument of the revival of Catholicism in the United Kingdom. The contribution setting makes to its significance is considerable. The cathedral's scale and site make it prominent across the city, and it is one of Norwich's landmarks¹²¹.

¹¹⁹ CD2.10. NCC CAA, p. 17.

¹²⁰ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1051299>

¹²¹ CD11.18. HE GPA 3, step 2, attributes: topography; other heritage assets; surrounding landscape or townscape character; views from, towards, through, across and including the asset; intentional intervisibility with other historic and natural features; visual dominance, prominence or role as a focal point.

- 6.58. The majority of the city's medieval churches are more modest in character, but they too are generally of high significance. They too both contribute towards the character of streetscape and cityscape and draw significance from their settings. I have already considered the churches most relevant to the inquiry in the southern half of the city, and shall consider those to the north of the river below.
- 6.59. The great royal, religious and civic buildings of Norwich – the castle, the medieval and now Anglican cathedral and the 19th century Catholic cathedral, and City Hall – are set to the south of the Wensum, and with the exception of the medieval cathedral are arrayed on the ridge which looks over the river valley. They are, as suggested in this selective analysis, set amidst a pattern of spaces and streets, medieval in origin but lined with buildings, generally of three stories or thereabouts, varied in date but in many cases remarkable for the richness of their historic and architectural interest.

Norwich North of the Wensum

- 6.60. This pattern of development, and wealth of history and architecture, continues to the north of the Wensum, at least as far as the inner ring road which so severely disrupted it. The northern half of the city was, and remains, distinct, however, in part due to the absence of monuments or buildings comparable in importance to the major monuments of the southern half. Indeed until the mid-19th century parts of the land enclosed by the northern walls remained undeveloped.

6.61. St. Clement’s Church stands on the junction of Fye Bridge Street and Colegate. Its origin’s lie in the first half of the 11th century, but the present church dates from the 15th and 16th centuries. The tower was built in c. 1450 and the nave rebuilt in c. 1550. The church is listed at grade I¹²². It too draws significance form its setting, in addition to the interests intrinsic to the building. In the approach to Fye Bridge and the northern part of the historic city the church tower rises above the historic buildings by the bridge, and the east wall of the chancel fronts the road; and it is sufficiently tall to take its place in the assembly of church towers which are so much a part of Norwich’s roofscape¹²³. Set back within a small churchyard, it frames the entrance to Colegate. Its role as a landmark and its place in the streetscape aid the appreciation of the church’s qualities¹²⁴.

Colegate

6.62. Colegate is one of the finest historic streets in the northern city. It forms part of an historic pattern of streets. On its south side are former master-weavers houses: numbers 18 and 20 are particularly fine 18th century examples. On the north side are both the Old Meeting House and the Octagon Chapel. The first, dating from 1693, is the oldest Nonconformist meeting house remaining in Norwich. The second was built to Thomas Ivory’s designs in 1754-6. Both have considerable architectural presence: the Old Meeting House has a fine brick frontage the central bays of which

¹²² NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1051282>

¹²³ CD7.81 SEI (t) Compendium of Views: 8.

¹²⁴ CD11.18. GPA 3, step 2, attributes: other heritage assets; definition, scale and “grain” of surrounding streetscape; landscape and spaces; surrounding landscape and townscape character; visual dominance, prominence or role as focal point.

are framed by Corinthian pilasters, while the Octagon Chapel’s distinctive plan creates a spacious galleried interior. Both also are set back from Colegate in secluded settings¹²⁵. They are listed at grade I and II* respectively¹²⁶. To the east of the Octagon Chapel, on the junction with George’s Street is Bacon’s or Bacon House, the substantial remains of a large courtyard house of the 15th-17th centuries, now listed at grade II*¹²⁷. Of considerable architectural and historic interest, its setting in a fine historic streetscape, into which discordant development does not intrude, contributes to its significance.

- 6.63. St. George, Colegate was largely rebuilt between the mid-15th and early 16th centuries. The result is a handsome Perpendicular church; unusually, the church retains fine 18th century fittings. St. George is listed at grade I¹²⁸. It contributes to the attractive character of Colegate, and its setting, on the junction of Colegate and St. George’s Street, is rich in historic and architectural interest in respect both of the pattern of the streets and the buildings which stand on them. Their relationship with the church enriches its interest, while its tower is both a landmark within this area and forms part of the array of towers which articulate the cityscape¹²⁹.

¹²⁵ CD2.10. NCC CAA, pp. 58 and 61. CD11.18. HE GPA 3, step 2, attributes: definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces; sense of enclosure, seclusion, intimacy or privacy.

¹²⁶ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1206474> and <https://historicengland.org.uk/listing/the-list/list-entry/1280186>

¹²⁷ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1051320>

¹²⁸ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1206500>

¹²⁹ CD11.18. HE GPA 3, step 2, attributes: other heritage assets; definition, scale and “grain” of surrounding streetscape, landscape and spaces; surrounding landscape and townscape character.

Magdalen Street

6.64. Magdalen Street runs north from Fye Bridge Street to the line of the medieval walls and was one of the principal thoroughfares of the historic city. It is lined with many historic buildings, albeit generally of more modest in character than those of Colegate. Gurney Court is a perfect example of the courtyard buildings once characteristic of Norwich: it comprises two 16th century ranges to north and east, a late-17th century range to the street, re-fronted in the 18th century, and a mid-17th century range to the south, together forming a building of great architectural and historic interest. The other house which stands out is number 44, a bold Georgian frontage of the mid-18th century. These buildings are both of high architectural and historic interest, and many of the buildings on Magdalen Street are also significant in their own right¹³⁰. Together they form a street of considerable architectural and historic character¹³¹.

6.65. St. Saviour’s Church is a modest late medieval church. Its tower was lowered in the 19th century. It stands on Magdalen Street itself, but its historic setting has been compromised both by the clearance of buildings to its east and by the construction of the inner relief road and Anglia Square itself. Its present setting detracts from as much as contributes to its significance. The church is listed at grade I¹³².

¹³⁰ CD2.10, NCC CAA, p. 63, Colegate buildings map.

¹³¹ Magdalen Street south of the flyover forms part of the Colegate character area: on the appraisal map in CD2.10, NCC CAA (p. 59) the frontages of the street are uniformly marked as “positive”.

¹³² NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1372838>

- 6.66. Magdalen Street’s character is of course radically harmed by the St. Crispin’s Road flyover which now divides the street and blights the view northwards¹³³.
- 6.67. To the north of Colegate and to east and west of Magdalen Street the historic character of the city becomes less coherent. 19th and 20th century industrial development, compounded by bomb damage, largely accounts for this. Nevertheless, much of historic interest and character survives. St. George’s and Calvert Streets retain their historic form and are lined with buildings which contribute to the area’s character. Duke Street and Muswell Street are also lined in part with buildings which lend the area character¹³⁴.
- 6.68. St. Martin-at-Oak is a modest church, dating largely from the 15th century but much rebuilt in the mid-20th following bomb damage. It comprises chancel, aisled nave, bot handsomely fenestrated, and tower, the latter rebuilt but no longer rising above the body of the building. The church is listed at grade I³⁵. The historic streetscape in which it stood has been largely lost, although one can see St. Mary Coslany to the south. Its present setting contributes modestly to the church’s significance.
- 6.69. Now standing immediately to the south of the inner relief road, Doughty Hospital is a late-19th century reconstruction of 17th century almshouses. Built in a Tudor manner, with prominent chimneys, its three-sided courtyard is surrounded by an open gallery.

¹³³ CD2.10. NCC CAA. Identified as a “negative view” on the appraisal map (p. 59).

¹³⁴ CD2.10. NCC CAA. The appraisal map illustrates these points (p.59).

¹³⁵ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1051925>

The intimate character of the courtyard is compromised by the presence of Guildengate House beyond. It is listed at grade II¹³⁶

Between the Inner Relief Road and the City Walls

- 6.70. St. Augustine’s Church on St. Augustine’s Street is the northernmost of Norwich’s medieval churches. A large Perpendicular church, its medieval tower re-cased in brick in 1683-7, St. Augustine’s is listed at grade I and its archaeological, architectural and historic interest is high¹³⁷. The church’s setting makes a complex contribution to the appreciation of its significance. St. Augustine’s stands within an extensive churchyard beside St. Augustine’s Street, a street of rich historic character; and the churchyard is enclosed to the south-east by Guildencroft, a 16th century terrace of almshouses. In so far as its setting remains in part historic this reinforces the church’s significance. On the other hand, the comprehensive redevelopment of the site to the east to form Anglia Square severely harmed the church’s setting: the historic buildings of the east side of Pitt Street were demolished; their site was left empty; and both this and the colossal form of Sovereign House radically disrupted the fabric of the cityscape of which the church formed part. All this compromises one’s appreciation of the church’s significance¹³⁸.

¹³⁶ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1187193>

¹³⁷ NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1051896>

¹³⁸ CD11.18. HE GPA 3, step 2, attributes: other heritage assets; definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces; openness, enclosure and boundaries; surrounding landscape or townscape character; views from, towards, through, across and including the asset; visual dominance, prominence or role as focal point. In this case these attributes in the building’s setting variously contribute to and detract from its significance.

- 6.71. St. Augustine's Street and Magdalen Street north of the flyover are both streets of considerable historic character, lined with many historic buildings of two to three stories dating from the 17th, 18th and 19th centuries (and in the case of St. Augustine's Street some of earlier date)¹³⁹. In both cases their character is blighted by Anglia Square. The 1960s/70s development disrupts the character of Magdalen Street immediately north of the flyover; and the view south along St. Augustine's Street towards the heart of Norwich are largely blocked by its bulk, the presence of which in the wider cityscape is incongruous.
- 6.72. Such was the extent of the area enclosed by Norwich's medieval walls that parts of the northern city to either side of these streets remained undeveloped until the 19th century. Sussex Street, built in 1821-4, is an unusually fine late-Georgian street, but amongst the later 19th century streets of the city a number of earlier buildings of interest survive¹⁴⁰.
- 6.73. The northern part of the circuit of walls remains evident, whether in their surviving fabric or the trace they left in the laying out of later streets. Reference has already been made to the impressive stretch on Magpie Road. There is a further more extensive run, terminating in a tower, to the east in Bull Close Road, while to the west of St. Augustine's Street, on Bakers Road, is another long stretch, in varying states of completeness.

¹³⁹ CD2.10. NCC CAA, buildings maps for Northern and Anglia Square character areas, pp. 41 and 47.

¹⁴⁰ The Georgian buildings here are listed. See CD2.10. NCC CAA, p. 41.

Conservation and Change

- 6.74. The city enclosed by the line of the medieval walls is an extraordinary place. Norwich is one of England’s and Europe’s great historic cities. Among England’s most important cities throughout the medieval period, Norwich remained, through periods of vicissitude and relative decline, a prosperous place thereafter. Although not immune to the misfortunes which beset all historic places – fire, war and ill-conceived clearance and reconstruction – Norwich’s history has bequeathed to us a city of exceptional richness of character.
- 6.75. Something must be said, however, of the degree to which that character has been compromised in places. That the historic city has been damaged is hinted at by Pevsner and Wilson in their observation cited at the beginning of my proof¹⁴¹.
- 6.76. The harmful effect of “some of the taller modern buildings” in Norwich is noted in the Conservation Area Appraisal. “Out of scale” and with “blocky silhouettes”, nine are identified as being negative landmarks. These include Anglia Square itself, as well as Normandie and Winchester towers, both of which rise to 16 stories¹⁴².
- 6.77. Historic England has surveyed the city and identified 32 buildings of six stories or more – that is, buildings which rise above the prevailing heights of the historic city¹⁴³. Some of these would, in any re-appraisal of the conservation area, deserve to be added to the list of “negative landmarks”. An example is the “Quad”, a 12-storey

¹⁴¹ BoE, p. 179.

¹⁴² CD2.10. NCC CAA, p. 17.

¹⁴³ HE1/5 Appendix 4: Tall Buildings in Norwich.

block of student housing on All Saints Green, recently completed. Although not without architectural interest, this building is a harmful presence in a variety of views across the city, particularly that to the castle from the northern end of Magdalen Street¹⁴⁴.

- 6.78. In addition to these “tall” buildings, there has been a great deal of modern development in the city. Little of it has enhanced the character of Norwich; some has harmed it; but much passes relatively unnoticed. The buildings maps in the Conservation Area Appraisal provide an indication of which buildings detract from the character of the area¹⁴⁵.

Three Perspectives on Norwich

- 6.79. I have sought to convey the principal lines of the historic city’s development, the significance of some of its most notable buildings, and the character of the city in the foregoing account. The Norwich City Centre Conservation Area Appraisal provides a systematic analysis of the area enclosed by the circuit of the walls, and identifies 13 “character areas”. While not questioning this approach, I shall close this consideration of the character and significance of Norwich by examining the city from three perspectives which will provide a structure, in a subsequent section of this proof, to help understand properly the impact of the proposed development on character and appearance of the conservation area and the significance of the principal designated heritage assets.

¹⁴⁴ HE1/6 Appendix 5: Views of Norwich, item 20.

¹⁴⁵ CD2.10. NCC CAA, pp. 41, 47, 55, 63, 73, 83, 91, 99, 107, 115, 121, 129, 135.

The Environs of Anglia Square

- 6.80. The environs of Anglia Square and the site of the proposed development itself lie at the heart of the northern part of historic Norwich. Well within the circuit of the medieval walls, part of the area was also within the Saxon burgh, whose defensive ditches ran along what is now Botolph Street¹⁴⁶. Together they form an area of radically contrasting character. Here the rich pattern of the city’s historic development has been brutally damaged by modern development¹⁴⁷.
- 6.81. The two principal causes of that damage were the construction of the inner link road and that of Anglia Square¹⁴⁸. The link road severed the network of streets which is essential to the pattern of the city, creating a barrier which forms a breakage in the fabric of the city, and thereby harming the character of the conservation area. Even where raised above Magdalen Street the road’s effect is to divide. The comprehensive redevelopment of what became Anglia Square compounded this damage by obliterating a part of that network of streets to the north of the new road, and with it the houses and buildings which defined the streets. In their place arose a group of buildings – Sovereign House, the shopping centre and cinema, Guildengate House and the multi-storey car park – whose form and mass are radically at odds with the surrounding cityscape, and which close both passages and views across their site. The greater part of the space between Sovereign House and Pitt Street has

¹⁴⁶ CD2.10. NCC CAA, p. 43.

¹⁴⁷ The area considered here includes but extends beyond the Anglia Square “character area” identified in CD2.10. NCC CAA, p. 43.

¹⁴⁸ See Section 4, above.

remained empty since the handsome buildings which once lined it were demolished¹⁴⁹.

6.82. It is not surprising, in view of all this, that the Anglia Square character area of the city centre conservation area is appraised as being of low significance. This reflects that it has few or no buildings either statutorily or locally listed (there are some of the latter), little or no evidence from historical periods, little or no evidence of historic street pattern, few views of landmarks, green or urban spaces, little or no consistency in use of, or limited range of, high quality building materials, architectural details and / or surface treatments, and a significant concentration of negative landmarks / buildings or details¹⁵⁰. These points are illustrated, the latter one forcefully, in the appraisal and buildings maps for the character area¹⁵¹.

6.83. As has been described, however, much survives of historic Norwich in the larger area in which Anglia Square sits. Magdalen Street, survives as one of the northern city's principal streets. Marred by the flyover, and by the somewhat oppressive and discordant character of Anglia Square itself, it nevertheless remains a street of considerable historic character, lined with a number of 18th to 19th century buildings¹⁵²; and one sees from what would have been the entrance through the

¹⁴⁹ Photographs in CD2.10, NCC CAA, p.44, and CGMS, p. 16, give an indication of the quality and interest of some of the historic buildings lost from Pitt Street and Botolph Street.

¹⁵⁰ CD2.10. NCC CAA, p. 33. Only two of the 13 character areas are appraised as being of low significance.

¹⁵¹ CD2.10. NCC CAA, pp. 45 and 47.

¹⁵² CD2.10. NCC CAA, p. 44, notes these as forming the only positive group within the Anglia Square character area.

medieval wall, if travelling southwards, a long prospect through the city to the castle high above, albeit a prospect marred by the presence of Anglia Square¹⁵³.

6.84. Anglia Square's effect on St. Augustine Street is starker. If one looks southward from what would have been the gate to St. Augustine's Street towards the centre of the city the view ends in the bulk of the buildings of Anglia Square. Although the cathedral spire rises above Sovereign House, the modern development breaks the pattern of the city and removes the sense of connection which is so characteristic of the city's historic streetscape¹⁵⁴.

6.85. St. Augustine's Street itself remains a fine historic street, lined with houses of broadly harmonious character, many, as we have seen, of historic interest. The street's character is reinforced by the presence of St. Augustine's Church at its southern end, set within its churchyard bounded by Guildencroft, by its opening to Sussex Street, and by its looser relationship to other historic buildings and structures in the wider area, most obviously the remnants of the medieval walls in Bakers Road.

6.86. Taken as a whole, the wider environs of Anglia Square partake of Norwich's exceptional historic and architectural character, and are enriched by buildings and structures of archaeological, architectural and historic interest, sometimes high interest. That their interest does not match in intensity or degree that of the most exceptional areas of the city – the Close, Elm Hill and Maddermarket, Colegate –

¹⁵³ See HE1/6 Appendix 5: Views of Norwich. This view is also marred by both the Westlegate tower, recently heightened, and by the construction of "the Quad" on All Saints' Green, both of which now join the castle in terminating the prospect.

¹⁵⁴ CD7.81 SEI (t) Compendium of View, p.36, view 15, existing.

must not obscure that interest, nor allow its contribution to the significance of Norwich as a whole to be obscured.

The Intimacy of the City

- 6.87. One way in which the significance of Norwich as a city might be explored is by considering what may be called the intimacy of the city. A part of that significance derives from the rich assemblage of spaces, streets and incidental views the qualities of which are fundamental to the city's special character. While the city's major monuments – the cathedrals, the castle, City Hall, the greater churches – necessarily stand out, and are themselves remarkable, they are embedded within a historic cityscape which, in the pattern of its spaces and streets and in the fabric of its buildings, retains its integrity and authenticity to an outstanding degree¹⁵⁵.
- 6.88. The quality of intimacy can be found throughout the historic city.
- 6.89. Although quite expansive, Tombland is an intimate space, enclosed by the surrounding buildings, softened by its mature plane trees, given character by its paving; and the one long view along Wensum Street across the river to the northern city is not marked by anything which intrudes upon its sense of place.
- 6.90. Elm Hill and the adjoining streets form what can feel like an enclosed world little altered by modern developments – a world of narrow, cobbled streets lined with timber-framed and plastered houses, the sloping triangular space on Elm Hill at its

¹⁵⁵ CD12.2. HE, Conservation Principles, Definitions, p. 71.

heart, and two modest medieval churches, in modest churchyards, on the higher ground above. Again, little if anything in the views out of this area intrudes on its particular, and strikingly intimate, character, with the exception, of views to the cathedral, and, in views from Prince's Street, of the clock tower of City Hall, whose meaning lends it a certain timelessness.

- 6.91. Although the character of Colegate is more open than that of Elm Hill, the grid of streets at whose centre Colegate lies is also intimate in character. Colegate itself is relatively broad and its buildings are of some pretension, but the street is quiet and contained, while the streets and alleys which lead off it are narrow and modest in character. The scale of the two churches on Colegate answers that of the street, and their churchyards are modest. The immediate settings of the Old Meeting House and Octagon Chapel, both of which have something of the seclusion once necessary to nonconformist meeting places, despite their architectural ambition, are especially intimate. The principal views out of this area are to the south and north. From the northern end of Calvert Street one can look back to the castle and to St. Andrew's Hall, a view which takes one beyond the particular character of Colegate, but reinforces one's sense of the area's place in the historic city¹⁵⁶. Views north along Calvert and St. George's Streets are characterised both by the modesty of the streets themselves, and the absence of terminal features. In these views little disrupts the predominant sense of place created by the historic streets and buildings of the area.

¹⁵⁶ CD2.10. NCC CAA, p. 58.

6.92. Related points could be made even in respect of the looser and less well-preserved areas to the north-west of Colegate. While the streets here may be less well-defined, due both to the loss of historic buildings and to combined effects of the industrialisation of the area in the 19th century and redevelopment in the 20th, the character of the cityscape around churches such as St. Martin at Oak and St. Mary's has a modesty derived in part from their character and the scale of adjacent development. While the scale of nearby modern development on St. Crispin's Way – and Anglia Square itself – contrasts radically with this modest character, the disposition of streets and buildings is such that it does not greatly intrude.

The Image of the City

6.93. Finally I turn to what I have called the image of the city. By this I refer to the interplay of the city's great landmarks with each other, and with the broader fabric of the historic cityscape. Together these create Norwich's identity as an historic city.

6.94. The components of the image of the city have already been noted. They include Norwich's six principal landmarks – castle and medieval cathedral, St. Peter Mancroft and St. Giles, the 19th century cathedral and City Hall. They include the body of 35 medieval churches. They also include the network of spaces and streets rooted in the early development of the city and the array of buildings from successive centuries which define them.

6.95. Taken together these form what I have called the pattern of the city. Norwich is a city of ancient spaces and streets, lined with a remarkable number of historic buildings,

and given shape too by a number of medieval churches unmatched anywhere in northern Europe. Its historic buildings are generally of three stories or thereabouts, and the church towers rise – sometimes slightly – above its roofscape, forming landmarks in their environs, and articulating the roofscape of the city. The city’s six principal landmarks in turn rise above the entire city.

- 6.96. The tower and spire of the medieval cathedral, the castle, the 19th century cathedral and City Hall’s clock tower are visible from across the city, appearing in views from bridges, down side-streets or terminating vistas. Their ubiquity is one of the city’s most striking characteristics.
- 6.97. Norwich’s cityscape is not undamaged by unsympathetic or indifferent development, but what makes the city special is represented by this pattern – the city’s historic pattern of development. And dominating the city as a whole is the extraordinary group of monuments which are the city’s six principal landmarks. Their individual significance has been explored earlier in this section of the proof.
- 6.98. It is from the Mottram Monument on St. James’ Hill that the best panorama of Norwich can be obtained, and it is from here that one can best appreciate “the image of the city”¹⁵⁷. The valley of the Wensum lies below. Directly opposite stands the cathedral rising from the floor of the valley, seemingly at once reliquary, architectural model and monumental work of art, such are the curious effects of scale. The experience is quite unlike that suggested by the photomontage, in which the

¹⁵⁷ CD7.81 SEI (t) Compendium of Views, p. 18-21, viewpoint 8.

cathedral is a distant object in a flat image. Standing on St. James' Hill one feels one could reach out to touch the building. Around it is the precinct, with, to the right, the further precinct of the Great Hospital. Behind, the ground rises to the ridge extending from Ber Street, and above the valley one sees the castle keep, St. Peter Mancroft with its distinctive lead-covered spirelet, City Hall resembling some palace in a central European town and its clock tower rising to the height of the pinnacles of the cathedral tower, and to the right of the cathedral, still on the ridge, the tower of St. Giles immediately next to the greater bulk of the 19th century cathedral and its tower.

- 6.99. The wider cityscape is marked by the towers of the city's medieval churches, in this view most densely concentrated on the slopes falling to the river and close to its northern bank. One can see the towers of St. Helen's, in the foreground of the cathedral; St. Peter Hungate, above the north transept; St. Gregory and St. Giles, the former in the foreground of the latter; St. Laurence, to the right of the Catholic cathedral; St. Martin-at-Palace, to the north or right of the precinct; St. Margaret and St. Benedict, to the right or north of St. Laurence; and, north of the river, St. Clement, across the river or to the right of St. Martin; St. George, Colegate, taller and to the right and beyond; St. Michael Coslany, again taller, and to the right of and beyond St. George; and, finally, and less distinctly, St. Edmund, a slight presence in the roof-scape between St. Michael to the left and the bulk of Jarrold's handsome Printing Works, with its copper domelet, to the right. One may also note the pyramidal roof of the Octagon Chapel rising between the towers of St. Edmund's and St. Michael's Churches.

6.100. The prospect of Norwich from St. James' Hill is exhilarating. The topography of the river valley is evident and dramatic. Cathedrals, castle, City Hall and churches together shape and lend meaning to the cityscape. The whole is encircled by wooded ridges. The cityscape is not unblemished, but it is exceptional. This must be one of the finest panoramas of an English city.

7. THE APPLICATION SCHEME AND ITS DESIGN

- 7.1. With the hybrid planning application before this inquiry planning permission is sought for the comprehensive redevelopment of Anglia Square.
- 7.2. It is proposed to demolish Sovereign House, the shopping centre, cinema and multi-storey car park. The small group of 19th century buildings at the south-west corner of the site would also be demolished, as would the adjacent Surrey Chapel. A small part of the existing complex would be retained at the north-east corner of the site, as would be Guildengate House.
- 7.3. The proposals for the redevelopment of Anglia Square encompass the whole site, including the extensive surface car-park adjacent to Pitt Street (and to the 19th century buildings mentioned above), as well as two smaller areas of land to the north. On the principal site they would entail creating two squares, a new Anglia Square and George's Square, the former connected to both St. Augustine's Street and Magdalen Street and the latter forming part of a new George Street. Around these spaces and routes would be built a series of very substantial buildings rising from five to 12 stories and, on George Square itself a tower of 20 stories¹⁵⁸.

¹⁵⁸ For a plan showing the distribution and height of blocks see CD7.81 SEI (x) ES (SEI) Technical Appendix 13.2: Townscape and Visual Impact Assessment Addendum, August 2018, p. 10, figure 3.1.

- 7.4. A detailed description of the proposed development is provided in the Statement of Common Ground¹⁵⁹.
- 7.5. While I shall not undertake a comprehensive critique of the design of the application scheme, questions of design are clearly pertinent to Historic England’s interest in historic buildings and places; and the design of the scheme is necessarily responsible for the way it would, were it to be built, affect the historic city. Here I shall note two arguments relating to design which are critical to the applicants’ presentation of the scheme and to their assessment of its effects. They are the assessment of heritage sensitivity represented by the “heat maps” discussed by the applicant’s consultants, CgMs, and some of the arguments advanced for the tower. I shall also draw attention to Design South-East’s review of the proposals as they were being developed and in the form in which they were first submitted for planning permission.

CgMs’s “heat maps”

- 7.6. At the close of their assessment of the significance of heritage assets which would be affected by the proposed development, CgMs consider the sensitivity of those assets to the potential massing of the redeveloped Anglia Square¹⁶⁰. They represent their conclusions in annotated maps, in which limits to height beyond which development would be likely to have a major impact on the setting of heritage assets, potentially causing a high level of harm to their significance, are indicated¹⁶¹. Different colours have been used to indicate different levels of sensitivity to create “heat maps”. In

¹⁵⁹ Statement of Common Ground (henceforth “SOC” in references), paragraphs 26-32, pp. 6-11.

¹⁶⁰ CgMs, section 4.6, pp. 72-78.

¹⁶¹ CgMs, section 4.6, p. 73, 2nd paragraph .

addition to two initial maps, five have been provided dealing with different levels of sensitivity from “extreme” to “low”.

- 7.7. These complicated maps are intended to convey a still more complex analysis. It is important to recognise that they also convey, and depend upon, a series of judgements. When their composition and limitations are recognised it is apparent that they provide a much less objective or comprehensive analysis than the place accorded to them might suggest.
- 7.8. The limitations of the method used to produce these maps are considerable. They have been conceived largely to explore the effect of development on adjacent buildings or streets and on a small number of views – particularly those to the cathedral from St. Augustine’s Street and from within the development. Many of the effects that the redevelopment might have are not considered. For example, no mention is made of the important view from the castle across the northern city.
- 7.9. Beyond this, as CgMs acknowledge, the maps provide no aide in assessing the cumulative impact of development were it to approach the recommended height limits across the site¹⁶². What this implies is that they provide no aide in considering the impact of the proposed development on the character of Norwich’s city centre conservation area, despite this being one of the most important questions to which the application gives rise.

¹⁶² CgMs, section 4.6, p. 73, 2nd paragraph.

- 7.10. Considerable as they are, these limitations are compounded by the discrepancy between the suggested height limitations set out in the heat maps and the recommendations CgMs themselves have made under the heading “Initial Assessment Recommendations” immediately preceding their sensitivity analysis. Their analysis extends to eight points, the first two of which I reproduce here:

New proposals which seek to maintain a scale comparable to the existing buildings, whilst allowing some graduation down towards the edges of the site, will help to integrate new buildings into the historically sensitive surroundings.

The impact of new development within the wider context can be minimised by broadly following the datum established by the existing buildings, which have been found not to impact on the setting of historic city landmarks or harm their overall high significance.¹⁶³

- 7.11. I would broadly agree with almost everything in these eight points, excepting the seventh. This reads: “Apply a high specification of design and materiality to any tall buildings / point block tower feature”. The inclusion of a “point block tower feature” would run counter to the body of the recommendations, and no explanation is provided as to why it might be appropriate.

- 7.12. Given these limitations and contradictions, I consider that little weight should be given to CgMs’ “assessment of heritage sensitivity” by way of the heat maps. What they may show to some degree is how the applicants have thought about minimising

¹⁶³ CD4.86 ES Volume 3 (i) CGMS, section 4.5, p. 71.

the harmful effect of the proposed development, as they are enjoined to do in step 4 of the approach set out in the Good Practice Advice Note on Setting¹⁶⁴. This is a case, however, in which the nature of development is such that it cannot but cause considerable harm.

The Rationale for the Proposed Tower

7.13. I now turn to consider and dispute parts of the suggested rationale for the proposed tower block. The applicant’s arguments explain, in part, the very great differences between their estimate of the effect of the development, and the tower in particular, on historic Norwich, and mine.

7.14. The applicants have argued variously that the proposed tower block would form a strong visual counter-point to the cathedral’s tower and spire, would represent the revitalisation of Anglia Square as an important place in the northern city, would act as a “marker”, and would add “time depth” to the setting of the city’s historic landmarks and other historic buildings¹⁶⁵.

7.15. What is common to these arguments is that they fail to take proper account of the significance of Norwich as a historic city and of the significance of its streets, spaces and buildings.

¹⁶⁴ CD11.18. HE GPA 3, step 4, p. 14.

¹⁶⁵ CD4.10. DAS, p. 78.

- 7.16. I have explored the significance of the cathedral above¹⁶⁶. As noted there, the cathedral was built to be pre-eminent, as were the great medieval cathedrals. Its pre-eminence is reflected in artistic representations of the city and survives today. The suggestion that a tower should be built as “a strong visual counter-point” to the cathedral is misconceived; and the notion that the cathedral’s “fundamental characteristics” would be “generally reinforced and celebrated” by the presence of such a counter-point is difficult to understand¹⁶⁷. The architects’ suggestion that the initial 25-storey design responded to the design of the cathedral is unpersuasive; and the illustration of that design beside a drawing of the cathedral serves, unintentionally, to demonstrate the contrast between the proposed building – which must be described as a block of flats – and the monumental work of architecture which is the medieval cathedral¹⁶⁸.
- 7.17. There is no doubt that, were the proposed scheme to be implemented, the tower would “represent” the redevelopment of Anglia Square. That this would be so does not make the statement a sound rationale for the building. Exactly the same point can be made about the argument that the tower, were it to be built, would become a “marker building” (or landmark).
- 7.18. Both assertions must be examined in the light of the history of Norwich and its significance, and that of its buildings. As has been observed above, the seats of royal, episcopal and civic authority were early established to the south of the Wensum, and

¹⁶⁶ See above, paragraphs 6.13-6.30, pp. 42-49.

¹⁶⁷ CD4.10. DAS, p. 79.

¹⁶⁸ CD4.10. DAS, p. 104.

it is there, in consequence, that the great monuments of the city stand. Although the city's medieval churches are to be found on either side of the river, the proudest are to the south; and as much of the northern city remained open land until the mid-19th century there are fewer to the north.

- 7.19. It must also be observed that the great landmarks of the city are almost invariably buildings which represent church, state or municipality and are rich with meaning associated with these. That is generally true of all historic cities, especially those of medieval origin. Often the practical use of the landmark is plainly subservient to its symbolic function, something evidently true of the clock tower to City Hall.
- 7.20. This historical analysis does not mean that there must never be anything built in the north of the city which breaks the roof-scape, but it does belie the arguments put forward to justify the tower block. To derive the rationale for the proposed tower especially, from its potential role as marker and symbol, would be profoundly at odds with the character not only of the northern part of the city but with that of Norwich as a whole. What would be appropriate instead would be to conceive the redevelopment as a means of repairing the pattern of the city.
- 7.21. There is one final, surprising argument suggested as a rationale for the tower block by CgMs. In their assessment of the effect of the development they refer repeatedly to the tower lending “time depth” to the setting of heritage assets and “grounding” them in their context. They comment as follows, for example, on the relationship of the tower to the castle.

Due to its prominence and in response to the historic pedigree of the city's outstanding landmark buildings a high quality design has been applied to the point block tower. Its form and outline, in conjunction with the brickwork detailing, vertical emphasis, fenestration and careful placement, complement its wider surroundings and introduce an element of time depth to the castle's extended setting. This serves to ground the asset in its broader urban context¹⁶⁹.

- 7.22. This is, at best, a peculiar argument. “Time depth” is an expression generally used to denote the depth of history to be found in a building or site; and the notion that Norwich’s historic buildings, which have stood in many cases for centuries and in the case of the castle for 900 years, are not “grounded”, is one which does not bear scrutiny. In fact this argument is especially unfortunate in respect of the castle, as I shall demonstrate, given the effect that the development would have upon the way in which its setting contributes to its significance.

Design South-East’s Review

- 7.23. It may be helpful to consider the review of the developing designs conducted by Design South-East on behalf of the Council, before turning to the impact of the proposed redevelopment of Anglia Square on the significance of Norwich, as Design South-East’s reports illuminate the nature of the development, and its relationship to the wider city. Design South-East provided two reports, in 2017 and 2018, on the

¹⁶⁹ CgMs, p. 95, Norwich Castle, 2nd paragraph

scheme¹⁷⁰. The second was concerned essentially with the design of what was then a 25-storey tower, part of the scheme submitted for planning permission; but the report noted “our previous concerns relating to the scale of the overall development and how this could negatively impact the surrounding area remain”¹⁷¹. No review was produced of the scheme in its final form.

- 7.24. Design South-East’s assessment of the proposed development was critical and touched on many of the points at which questions of design and the historic environment intersect. It may be most helpful to cite the reports directly

The Panel are concerned that this proposal constitutes over development. We fear it will not be possible to sensitively resolve a scheme at this level of density in this location... Issues relating to this include the way the proposed buildings will relate to the city’s surrounding historic fabric...

The aim to connect to surrounding is applauded... There is a limit, however, to how much can be achieved under such a challenging brief and the inevitable scale and nature of the development which results... There is a ... danger this scheme will create a series of dark, uninviting streets and spaces that will not feel like, nor be used as, an integrated and integral part of the city¹⁷².

The level of density proposed is more typically seen in central locations within major international cities. The Anglia Square site, set within a small historic city, therefore

¹⁷⁰ CD11.15. Design South-East, Design Review – Anglia Square, Norwich, 7 April 2017 and CD11.16. 10 May 2018 (henceforth in references “Design Review 2017” and “Design Review 2018”).

¹⁷¹ CD11.16. Design Review 2018, p. 2.

¹⁷² CD11.15. Design Review 2017, p. 2.

presents some uncommon challenges that will be extremely difficult, if not impossible to resolve at this level of density...

...the Panel have serious concerns about the bulk and mass of the proposal and how this will relate to the streets immediately surrounding the development and affect views across the wider city.¹⁷³

In terms of the impact on the wider city, our reservations about this being an inappropriate location for a tower remain – we still do not know if there is a sound and deep rationale for a tower here. However, as shown in the proposed views, the major issue now is perhaps not so much the single, relatively slim but still overly tall tower, but the bulk and mass of the surrounding blocks... With blocks over 10 storeys tall, it is only in comparison with the tower that these can be considered low rise, and in the context of the wider city they are very prominent. These blocks are not just tall, but also very deep and wide, creating monoliths that are out of scale with the fine grain of the surrounding historic fabric.¹⁷⁴

- 7.25. Design South-East's 2018 review dealt largely with the design of the tower. The report sets out a critique of the design of the 25-storey tower, as submitted for planning permission, but appears to accept the possibility of constructing a tower while making no references to the questions of location and rationale posed in the previous report. Nevertheless, while indicating that in general terms the footprint of the tower could be compatible with creating a tower of slender proportions, the

¹⁷³ CD11.15. Design Review 2017, p. 3.

¹⁷⁴ CD11.15. Design Review 2017, p. 4.

report continues: “However, as many of the proposed views show, in the context of Norwich this proposal currently appears relatively bulky and overbearing”.

- 7.26. Design South-East’s analysis of the relationship between the proposed development and the historic city and its effect on the latter’s character forms an important part of their appraisal of the scheme’s design. I shall now turn to consider the effect of the proposed redevelopment on the significance of Norwich.

8. THE IMPACT OF THE APPLICATION SCHEME ON THE SIGNIFICANCE OF NORWICH

- 8.1. What is at stake, in this inquiry, is the character of Norwich as an exceptional historic city, and the interest, often also exceptional, of the spaces, monuments and buildings which comprise the city. I argue here that the impact of the proposed development would be to cause severe harm to the character of the city, and harm in varying degrees to the interest of many of its spaces, monuments and buildings, among them some of the finest in the city.
- 8.2. It is the impact of the scheme on the significance of those designated heritage assets that the Framework requires us to consider¹⁷⁵. In this case the proposed development would affect the significance of the Norwich City Centre Conservation Area directly, as Anglia Square lies within the area and its redevelopment would change the character of the conservation area as a whole. It would affect the significance of many of the monuments and buildings within Norwich which are designated as heritage assets indirectly, by changing their setting in ways which would harm their significance.

Approach

- 8.3. Given the interplay between spaces, monuments, buildings and the character of the city as a whole, any analysis of the impact of the proposed development on the

¹⁷⁵ CD1.1. NPPF, chapter 16 throughout, especially 192. See also CD1.2. PPG, paragraph: 007 Reference ID: 18a-007-20190723.

significance of the varied and many designated heritage assets whose significance it would affect, will inevitably be complex. In the following analysis I shall consider the development's effect on significance broadly through consideration of the three perspectives on the significance of Norwich with which section six of this proof closed – the environs of Anglia Square, the intimacy of the city and the image of the city, before drawing overall conclusions. These three perspectives are intended to provide an approach which facilitates an understanding of the effect of the proposals upon the significance of the heritage assets affected, and especially that of the conservation area.

8.4. My analysis derives from study both of the application drawings and, most importantly, of the visualisations prepared by the applicants to illustrate the proposed development in a series of photomontages. These are presented in Cityscape Digital's Compendium of Views¹⁷⁶. Historic England is grateful to the applicants and Norwich City Council for engaging us in discussion of the appropriate viewpoints and responding to our suggested additions. For the purpose of this inquiry we consider that the photomontages provide a reasonable starting point for the assessment of the impact of the proposed development, providing their limitations are understood.

8.5. These limitations flow from the fact that the photomontages are essentially attempts to photograph the views as if the proposed buildings had been built. They allow one to see the form, bulk and articulation of the proposed buildings, but their ability to

¹⁷⁶ As noted above, p. 48, footnote 91. References in this proof are to the revised views unless indicated otherwise.

convey the experience one would have of the views is limited. In practice the reality of that experience may be quite different to what the photomontages suggest. They cannot convey the effects of changing light or the meanings which people read in views. They also tend to diminish the presence of both existing and – it may be assumed – proposed buildings. The photomontages provide an agreed starting point to the exercise of intelligent and imaginative engagement which is necessary to assess the likely impact of the proposed development.

- 8.6. The analysis I present here is radically different to that of the applicants’ consultants. The nature of the effect of the development on the significance of Norwich will be one of the principal matters in dispute at this inquiry. Without rehearsing the material submitted by the applicants’ consultants in detail, I shall note some of the divergences to illustrate their nature. I have already provided a critique of both the “heat map” produced by CgMs and the argument that the proposed tower block will serve as a way-marker¹⁷⁷.

The Impact of Clearance and Re-Planning on the Site Itself

- 8.7. The impact of the proposed redevelopment of Anglia Square would be felt most directly on the site itself and its environs. It is here that the “heritage benefits” which the applicants claim for the scheme would largely arise, and here that the mass of the proposed buildings would be most overwhelming.

¹⁷⁷ See above, paragraphs 7.6-7.22, pp. 79-85.

- 8.8. The development would entail the removal of the majority of the buildings dating from the 1960s and 1970s development. The identification of the buildings of Anglia Square as having a negative effect on the character and appearance of the conservation area is a matter of fact¹⁷⁸. The demolition of all but Guildengate House and the north-western corner of the existing complex may therefore be considered to have the potential to be a heritage benefit. Whether or not it would be one might be thought to depend on the nature of what replaced them.
- 8.9. The development would also entail the redevelopment of areas of undeveloped wasteland off Pitt Street. The empty area now used as a surface car park damages its immediate environs, including the setting of adjacent listed buildings, and harms the character of the conservation area. Again, this may be considered to have the potential to be a heritage benefit; but whether or not it would be one might be thought to depend on the nature of what replaced the undeveloped land.
- 8.10. The comprehensive redevelopment of Anglia Square has been planned around the partial reinstatement of lost streets across the site. The new Botolph Street would re-establish the connection between St. Augustine’s Street and Magdalen Street on an alignment close to those that previously existed – or, more accurately, replace the existing connection with a street. A new George Street would join Edward Street to Calvert Street. These streets would create a clearer relationship between surrounding streets and the development than currently exists.

¹⁷⁸ CD2.10. NCC CAA, p. 44.

- 8.11. The reinstatement of at least the principal streets which were lost to the existing development, on something approaching their original lines, would partially repair some of the damage done to the pattern of movement across the northern city by the present development, and would have the potential to do more to repair something of the damage that was also done to the character of this part of Norwich. In practice, however, the scheme would be no more permeable than the existing development; and it would remain coarsely grained when compared to the pattern of the historic city. The degree to which the purported heritage benefits would be realised would again depend on the nature of the built development which would determine the character of the recreated streets.
- 8.12. It is also suggested by the applicants that the creation of new streets and squares, well-landscaped, coupled with the new accommodation which would be built, would attract people to the area and result in more people appreciating the surrounding parts of the conservation area. Again, the degree to which this heritage benefit would be realised would depend on the nature of the built development and its relationship to the character of the site's environs and that of the historic city.
- 8.13. The alignment of the new Botolph Street has been contrived so as to create views of St. Augustine's Church and the Anglican Cathedral from within the development. Notwithstanding the character of the development itself, to which I turn below, the creation of views from within it to church and cathedral would do something to bind it to the pattern of the city. Views of the cathedral's tower and spire and views of the numerous medieval churches and their towers, and the multiplicity and variety of

such views, are so vital to the experience and character of Norwich that I accept the creation of such views from within the redevelopment to be a heritage benefit of some account.

8.14. A further purported heritage benefit would follow to Magdalen Street as a result of the superior quality of the replacement buildings here. While it is fair to conclude that the new buildings towards the street would be of a better quality than the existing, the question of whether that would create a benefit to heritage must depend of a full assessment of the proposed development on this street.

8.15. Taken as a set, the purported heritage benefits which would arise from various aspects of the proposed redevelopment of Anglia Square might be thought largely potential benefits. Whether they would be realised must depend on the impact of the development as a whole. For example, the suggestion that the partial reinstatement of the lost street pattern would be a heritage benefit is a fair one; but at the very least the degree of the benefit will depend on whether this work forms part of a development consistent with the pattern of the city or at odds with it.

The Proposed Development

8.16. The re-planned site would accommodate a series of very substantial buildings. The northern block (A) on Edward Street would be of seven stories, with further recessed stories rising to 11. On Magdalen Street the principal frontage would be of four stories, but this would form part of the seven and 11 stories of the Edward Street building (A), which would rise behind it. On St. Crispin's Way substantial blocks (G

and F) would rise to between seven and 12 stories, while the remodelled Guildengate House (J) would rise to seven. On the corner of St. Crispin’s Way and Pitt Street the new building (F) would rise to 12 stories, falling to seven and eight, before falling further(E) from seven to five facing the junction of St. Augustine’s Street and New Botolph Street. Detached from the main site, two further blocks of development (B and C), the latter the new Surrey Chapel, would be of four and three stories. The streets within the main development site would be lined with buildings rising, for the most part, to between six and 12 stories, being the inner frontages of the blocks described above. The exception to this would be the 20-storey tower block, rising on St. George Street and itself part of a much larger block (E)¹⁷⁹.

The Environs of Anglia Square

- 8.17. The effect of this proposed development on the environs of Anglia Square would be immense, and may be considered by following the same clockwise sequence around the site, before considering the presence of the new development in the wider environs.
- 8.18. That part of Magdalen Street immediately adjacent to the development would be very strongly affected¹⁸⁰. The existing structures of Anglia Square are of no value, and the loss of the block fronting the street, and that of the cinema beyond it, would not be regretted. The four storey range facing the street, although taller than the street’s historic houses and uniform in character, would not be discordant. Curiously,

¹⁷⁹ For a block plan showing building heights see CD7.81 SEI (x) ES (SEI) Technical Appendix 13.2: Townscape and Visual Impact Assessment Addendum, August 2018, p. 10, figure 3.1.

¹⁸⁰ CD7.81 SEI (t) Compendium of Views, pp. 76-77, view 34.

however, given that the scheme is promoted as a comprehensive redevelopment, the awkward structure on the north-east corner of the site would be retained; and while the unsightly multi-storey car park behind it would be removed in its place at least seven of the 11 stories of the main block (A) would appear. The result might be more seemly, but the new buildings would, when seen as a whole, be profoundly unsympathetic to the historic character of Magdalen Street¹⁸¹.

8.19. This point is reinforced if one considers the impact of the new buildings from the adjacent Cowgate Street¹⁸². While the loss of the multi-storey car park would in itself improve the streetscene, its replacement with a much more substantial building (A) would not. The proposed seven storey range would rise much higher than the car park, and a part of it would rise to 11 stories. This modest 19th century street of two storey terraces would abruptly terminate in development which would loom above it. The use of some sort of grey sheeting to clad the upper stories appears, in the photomontage, to be an ineffectual sleight of hand intended to reduce the building's presence. Any improvement in the quality of the building would be outweighed by the radical disparity of scale, and the character of the street would be harmed.

8.20. Similar points may be made in respect of the views obtained from a little further south in Magdalen Street, as one walks north. At the moment one's first impression of Anglia Square is that of a distant structure beyond the flyover¹⁸³. The sight detracts from the character of the view, but is relatively recessive. The scheme, however,

¹⁸¹ CD11.18. HE GPA3, step 3, attributes: prominence, dominance, or conspicuousness; dimensions, scale and massing.

¹⁸² CD7.81 SEI (t) Compendium of Views, pp. 78-79, view 35.

¹⁸³ CD7.81 SEI (t) Compendium of Views, pp. 90-91, figure 42.

would replace this with a set of blocks of much greater presence, at the centre of which would be one of the 11 storey pavilions of the northern block (A). The effect would be radically to change the scale of the historic cityscape, to the detriment of its character¹⁸⁴.

- 8.21. The effect of the proposed development would be similar when considered from a little to the north of the flyover. Here the angular forms of the cinema are at odds with the historic streetscape; their loss would be beneficial; but the new development would be at odds in different ways. The flank view of the four storey range on Magdalen Street would emphasise its mass, while the taller structures behind would loom above the streetscape¹⁸⁵.
- 8.22. While the applicants' arguments that the proposed new buildings would be better than the existing buildings is reasonable, their conclusion that the development would therefore enhance Magdalen Street – one of the purported heritage benefits – is not one I accept, for the reasons set out here.
- 8.23. The effect of the proposed development as it faces south to St. Crispin's Way and beyond is best included as part of a consideration of its influence on the wider cityscape.
- 8.24. The effect of the proposed development on the cityscape to its north-west would be markedly more pronounced.

¹⁸⁴ CD11.18. HE GPA 3, step 3, attributes: proximity to asset; prominence, dominance, or conspicuousness; dimensions, scale and massing; change to skyline, silhouette.

¹⁸⁵ CD7.81 SEI (t) Compendium of Views, pp. 92-93, view 43.

- 8.25. As has been noted, St. Augustine’s Church is the northernmost of the city’s medieval churches. While Sovereign House rises above the north end of Guildencroft, and its brick-faced water tower is prominent, the church’s immediate setting within its churchyard remains surprisingly little disturbed.
- 8.26. The proposed development’s impact upon the setting of both the church and Guildencroft would be highly damaging¹⁸⁶. The buildings of the eastern part of the site would rise above the length of Guildencroft, and in views from the churchyard the simple (though not undamaged) setting which this uniform and harmonious building now enjoys – one still largely of lawn and sky – would be lost. The presence of the bulky development would be exacerbated by the way in which the arrangement of blocks at right angles to each other would itself be at an angle to the long roofline of the terrace. As illustrated the effect appears most unfortunate. The presence of the development as illustrated would be exacerbated by lighting within the buildings¹⁸⁷.
- 8.27. The impact of these changes would be to harm the significance of Guildencroft. What survives of the integrity of its historic setting would be eroded, and a new setting of alien character created. The way in which the terrace’s setting contributes positively to its significance would be drastically reduced; and the development’s

¹⁸⁶ CD7.81 SEI (t) Compendium of Views, pp. 68-75, views 32 and 33.

¹⁸⁷ CD11.18 HE GPA 3, step 3, attributes: proximity to asset; position in relation to key views to, from and across; orientation; prominence, dominance, or conspicuousness; competition with or distraction from the asset; change to skyline, silhouette; lighting effects and ‘light spill’. In this section the attributes noted will generally be those which cause the development to cause harm.

harmful effect on the building's setting would severely compromise one's appreciation of Guildencroft's significance.

8.28. Guildencroft helps define the setting of St. Augustine's Church and has protected that setting from much of the detrimental impact that the existing buildings of Anglia Square might otherwise have had. The damage done to Guildencroft's setting would therefore equally be damage to that of the church¹⁸⁸. The analysis above, however, made no reference to the impact of the 20-storey tower block, consideration of which is particularly relevant to the assessment of the development's effect on the significance of the church.

8.29. As the northernmost of the city's medieval churches, St. Augustine's plays a part in the wider cityscape, its tower being a prominent feature locally. Already the bulk of the existing buildings of Anglia Square overshadow the place played by St. Augustine's in the cityscape. The vastly greater mass of the proposed development would compound this effect; and the presence of a 20-storey tower block would greatly aggravate the development's impact¹⁸⁹.

8.30. The relationship between church and proposed tower block is illustrated in viewpoint 32¹⁹⁰. The photomontage gives the superficial impression that the tower block would be of similar size to the church tower, but this is, of course, an illusion. When account is taken of perspective it is evident that only a very much larger

¹⁸⁸ See above, p. 65, paragraph 6.69, for the contribution of its setting to the significance of the church.

¹⁸⁹ CD11.18. HE GPA 3, step 3, attributes: proximity to asset; position in relation to key views to, from and across; orientation; prominence, dominance, or conspicuousness; competition with or distraction from the asset; change to skyline, silhouette.

¹⁹⁰ CD7.81 SEI (t) Compendium of Views, pp. 68-70, view 32.

building would appear as the tower block does in this image. Anyone experiencing this view in three dimensions would at once realise the disparity in scale between church and tower block; and the effect of the tower block's presence would be to render the church diminutive. Equally in any views approaching the church from north or south, the juxtaposition of the proposed development and the church would be to the detriment of the latter's prominence. The effect of the development would therefore be, through its impact on the church's setting, severely to harm its significance.

- 8.31. In only one way has the design of the proposed development recognised the importance of St. Augustine's Church. The proposed Botolph Street has been aligned so as to create a vista to St. Andrew's Church; and at the point at which the new street turns southwards it would be possible to see St. Augustine's in one direction and the cathedral in the other. This would encourage the appreciation of the church and respond to its historic role as a landmark. The claims made for this as a heritage benefit have been overstated. They take no account of the disparity of height and mass between the development and the church, which would subvert the attempt to integrate development and church within a coherent streetscene.
- 8.32. The character of St. Augustine's Street itself would be equally severely affected by the proposed development, again to the detriment of its significance. The street retains a coherent historic character consequent on the continuity of the largely 17th, 18th and 19th century houses which line it; and it is complimented by both Sussex Street

and St. Augustine’s Church to its west and south¹⁹¹. St. Augustine’s Street was and remains one of the approaches to the centre of the city, and the vista obtained from the northern end of the street, as one descends southwards, although marred by Sovereign House, still terminates with the spire of the cathedral. By the time one reaches the junction with Sussex Street the spire has been lost behind Sovereign House, which in turn has become much more prominent.

8.33. The proposed development would leave views of the spire itself little changed, but the development would be markedly more prominent in these views, and in the streetscape, than the existing Anglia Square. The effect of its presence would be to cause a high degree of harm to the street’s character.

8.34. In the long view from the northern end of the street the tower block would rise above the right-hand side of the street, transforming its character¹⁹². The tower would appear as very tall but also bulky, a structure radically different in form and character to the spire. From the point at which the photomontage is taken it would rise from the roof-scape above the tip of the spire, underlining its impact on the scene.

8.35. As one moves closer to Anglia Square the presence of the proposed development would grow greater. From the junction of St. Augustine’s and Sussex Streets the tower would loom higher and the mass of the lower blocks would rise above the

¹⁹¹ CD2.10. See NCC CAA, p. 37 and 41, for the appraisal and buildings maps for the Northern City character area.

¹⁹² CD7.81 SEI (t) Compendium of Views, pp. 36-37, view 15. Note that had the viewpoint been taken from the opposite side of the road the tower’s presence would be much more prominent. CD11.18. HE GPA 3, step 3, attributes (p. 13): position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; change to skyline, silhouette.

modest houses at the southern end of St. Augustine’s Street¹⁹³. While the articulation of the new development might be thought an improvement on that of Sovereign House, its very much greater scale would mean that the contrast between it and the character of the area would be much more pronounced, to the detriment of the street’s historic character¹⁹⁴.

8.36. Both St. Augustine’s Street and Magdalen Street end (or begin) on the line of Norwich’s medieval walls, and the views back to the cathedral and castle have already been mentioned¹⁹⁵. The proposed development would probably be visible from numerous points across the northern stretches of Anglia Square’s environs, loosely defined. A number of viewpoints are representative of this, and I shall consider two here.

8.37. Sussex Street’s interest derives from the quality of its early 19th century houses, the spaciousness of the street and the sense that it is an enclave with its own character. It is likely that the tower block would become visible in the distance in winter on the junction of Sussex Street and the Lathes. Its presence would be alien and erosive of the street’s enclosed character¹⁹⁶. Some harm would result to one’s appreciation of Sussex Street’s houses and to the character of the conservation area.

¹⁹³ CD7.81 SEI (t) Compendium of Views, pp. 38-39, view 16.

¹⁹⁴ CD11.18. HE GPA 3, step 3, attributes (p. 13): position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

¹⁹⁵ See above, p. 42, paragraph 6.11.

¹⁹⁶ CD7.81 SEI (t) Compendium of Views, pp. 108-109, viewpoint 51. The viewpoint is taken in summer, but the outline of the tower suggests that it would be visible when the leaves are off the trees. CD11.18. HE GPA 3, step 3, attributes (p. 13): competition with or distraction from the asset; change to general character (e.g. urbanising or industrialising).

- 8.38. The presence of the proposed tower block would be unambiguous in the view of the short but impressive stretch of the medieval city wall on Magpie Road. As noted above, the height of this stretch of wall, the survival of part of a tower, the historic and picturesque relationship between the wall and the adjacent houses, and the view to the cathedral spire beyond, lend it particular potency¹⁹⁷. Here it feels like a city wall!
- 8.39. The sight of the tower block rising above the wall – and that of the eastern parts of the development to the left of the ruined tower – would spoil this effect¹⁹⁸. It would disrupt the picture formed by the wall, adjacent buildings and spire beyond. The character of the tower block would be wholly at odds with that of the historic ensemble. Its mass and height would both diminish the presence of the cathedral’s spire and announce that of development whose vast scale would be similarly at odds with the grain of the historic cityscape¹⁹⁹.
- 8.40. The arguments advanced by the applicants’ consultants, that the presence of the tower would provide a “visual counter-point” to the horizontal wall, “in contrast to the historic character of the existing view”, that the design of the tower would help integrate into “highly sensitive surroundings”, that the tower would “introduce an

¹⁹⁷ See above, pp. 50-51, paragraph 6.34. This relationship may be described as historic, but the present scene is due to the removal of garages and associated conservation works in 2012.

¹⁹⁸ CD7.81 SEI (t) Compendium of Views, pp. 42-43, view 17.

¹⁹⁹ CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; change to skyline, silhouette; lighting effects and ‘light spill’; change to general character (e.g. urbanising or industrialising).

element of time depth” and serve “to ground the monument in its 21st century surroundings”, I consider to be unpersuasive²⁰⁰.

8.41. The effect of the proposed redevelopment of Anglia Square on all these historic spaces, monuments and buildings within the site’s immediate environs, and its wider environs to the north would be to harm their character and significance. I draw the following conclusions.

- a) The purported heritage benefits would be modest. They would principally form benefits to the Anglia Square character area of the Norwich City Centre Conservation Area.
- b) The nature of the proposed development would be radically at odds with the pattern of the city. Its impact on the environs of Anglia Square would cause harm to the Anglia Square and Northern character areas of the Norwich City Centre Conservation Area.
- c) The development would also cause harm to the significance of a number of other designated heritage assets in the site’s environs. The significance of St. Andrew’s Church and Guildencroft, listed at grade I and II respectively, would be severely harmed; and considerable harm would be done to that of the city wall on Magpie Road, a scheduled monument. The significance of other listed buildings in the site’s environs would also be harmed.

²⁰⁰ CgMs, Addendum to Built Heritage Statement, August 2018, pp.23-4, paragraphs 2.22-2.24. See above, pp. 82-85, paragraphs 7.13- 7.22.

The Intimacy of the City

- 8.42. The intimate quality which contributes so much to the special character of Norwich, and to the significance of city centre conservation area and of many listed buildings within it, would be equally harmed by the intrusion of the proposed redevelopment. Its effect can be observed by considering a number of the views produced to illustrate the application.
- 8.43. One of the qualities characteristic of almshouses is, usually, seclusion. Doughty Hospital may lie within the heart of the northern half of the walled city, but its grassed courtyard was and remains to a degree sequestered from the world. The proposed development would rise above the north and west sides of the courtyard, from which one would see not only the re-clad Guildengate House but also a series of taller masses to its west, culminating in the tower block²⁰¹. The photomontage shows the view looking directly north, but from the south-east corner of the courtyard the taller buildings to left-hand (western) side would probably be more prominent. One of the Hospital's distinctive features is the gallery which gives access to the first floor dwellings: again, from here the development would be more prominent.
- 8.44. The presence of Guildengate House already detracts from one's appreciation of the architectural and historic character of Doughty Hospital. It unbalances the ordered composition of the courtyard and compromises its cloistered character. The

²⁰¹ CD7.81 SEI (t) Compendium of Views, pp. 94-95, view 44.

proposed development would have the same effect, to a much higher degree²⁰². The contrast between the two can be measured by comparing the relationship of the Hospital's tall Jacobethan chimneys to the existing and proposed buildings. The harm to the Hospital's significance would be marked.

- 8.45. Doughty's Hospital is close to Anglia Square, but the effect of the proposed redevelopment would be felt in similar, if less pronounced, ways across the historic city north of the river. This can be seen in the photomontages which have been produced to illustrate views from Colegate.
- 8.46. Looking north from Colegate, Calvert Street is framed by Bacon House on the left, the substantial remains of a large courtyard house of the 15th-17th centuries, and numbers 27 and 29, a 17th century building heightened in the 18th, while behind the latter is the handsome 18th century flank of 2-9 Octagon Court²⁰³. These buildings, with their flint and timber-framing, rusticated plaster and red brick, make a fine group which frames the modest vista down the cobbled street beyond. It terminates in reasonably scaled post-Modern offices which over-sail the street above which rises, distant but insistent, the brick-faced water tank of Sovereign House. Despite the latter intrusion, this vista retains its character as a modest streetscape which opens off the grander, but nevertheless intimate, Colegate.

²⁰² CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; change to skyline, silhouette; lighting effects and 'light spill'.

²⁰³ Listed at grades II* and II: NHLE, <https://historicengland.org.uk/listing/the-list/list-entry/1280188>; <https://historicengland.org.uk/listing/the-list/list-entry/1051929>

- 8.47. The effect of the development would noticeably change the character of this scene. A mass of new development would rise above the modern offices at the end of the vista, culminating in the tower block itself. The bulk of the development would be double the height of the modern offices, and the tower much higher. The vista would no longer convey a sense of the continuity of the historic city: instead the radical disparity of scale between historic city and new development would be evident; and the historic hierarchy of spaces would be reversed²⁰⁴.
- 8.48. The prospect on St. George’s Street would be similarly changed²⁰⁵. In both cases there would be harm to the character of the character area of the conservation area and to the significance of the listed buildings affected.
- 8.49. While something of the coherence of the streetscape has been lost to the north-west of Colegate, the character of the streets here remains modest in scale, and the setting of St. Martin’s Church, in this way at least complements the character of the church. The redevelopment of Anglia Square would affect the surrounding streetscape in a manner similar to that discussed in relation to Colegate. In respect of St. Martin’s, although distant, the new development would provide a “stop” to the streetscape as tall as the church. The viewer would understand that the new buildings’ scale was radically different to that of the historic cityscape. The disparity of the new development’s scale and character would diminish the character of the church and change the character of the wider cityscape. The result would be to undermine the

²⁰⁴ CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; dimensions, scale and massing; change to built surroundings and spaces; change to general character (e.g. urbanising or industrialising).

²⁰⁵ CD7.81 SEI (t) Compendium of Views, pp. 82-85, view 37.

contribution made by the interplay of the church and its setting to St. Martin's interest, and to erode the historic character of the area²⁰⁶. The significance of both would be harmed.

8.50. Similar observations may be made about the impact of the proposed redevelopment on the character of Norwich south of the river. Views from Tombland, Elm Hill and on the riverside provide points of reference.

8.51. In a view from the south bank of the Wensum a little to the west of Fye Bridge one can look north to the Mischief Tavern, built c. 1600 and altered since, and Friars Quay, a thoughtfully composed housing development of the 1970s²⁰⁷. Between the two one sees the tower of St. Clement's Church. It is a quiet scene, into which the 20-storey tower would intrude, immediately to the left of the church tower, to the detriment of its character.

8.52. If the view of the proposed development from riverside might be described as incidental, that from Tombland would take its place in the experience of one of Norwich's finest spaces. As I have noted, Tombland is an exceptional space of extraordinary historic resonance. It is defined by the mostly historic buildings which enclose it; and the combination of these buildings, the irregularity of the space, the treatment of its surfaces and mature trees make it a place of beauty and delight. The only clear view from Tombland is that down Wensum Street to the north of the city,

²⁰⁶ CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; dimensions, scale and massing; change to built surroundings and spaces; change to general character (e.g. urbanising or industrialising).

²⁰⁷ BoE, p. 284. CD7.81 SEI (t), Compendium of Views, March 2018, pp. 84-85, view 27. This view was not revised following the amendment to the design of the tower.

and nothing in this view disturbs the integrity of the historic cityscape. Wensum Street itself is one of the city's principal historic streets²⁰⁸.

- 8.53. The change to the cityscape were the proposed tower block to be built would be profound. In views from Tombland the tower would rise above the buildings to the right of Wensum Street. As one walked north down Wensum Street it would come to form a conspicuous feature framed by the street and rising distinct above the roofs on the northern side of the river; and as one approached Fye Bridge it would remain visible in views which also take in the tower and chancel of St. Clement's Church.
- 8.54. The presence of the tower block in these views would very harmful. The integrity of Tombland – its completeness and its unspoilt character – would be impaired, as would that of Wensum Street²⁰⁹.
- 8.55. One of the points on Wensum Street from which the tower block would be conspicuous would be at the junction with Elm Hill. The streets around Elm Hill itself are perhaps the most extraordinary part of the historic city, being especially rich in character and remarkable for their coherence. The presence of the tower at the entrance to Elm Hill from Wensum Street would detract from their character, and it would be visible again in the views from the churchyard of St Peter's Hungate and from the junction of Elm Hill and Princes Street. In the latter view, looking down Elm Hill, framed by St. Peter's Hungate to the right and by both 4-6 Princes Street, a 17th

²⁰⁸ As noted above, p. 53, paragraph 6.39, Tombland forms part of the Elm Hill and Maddermarket character area of the Norwich City Centre Conservation Area. So too does Wensum Street

²⁰⁹ CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; dimensions, scale and massing; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

century house of particular interest on account of its plastered and rusticated façade, and the east wall of St. Andrew's Hall to the left, one would see the tower block rising above the streetscape to the left. Although only a small portion of the tower would be visible, its presence would be so radically at odds with the character of the streetscape that its impact would be disproportionate and very harmful.

8.56. To close this consideration of the impact of the development on what I have described as the intimacy of the city, I shall return to Fye Bridge. The view of the tower block from the bridge has already been noted. Fye Bridge itself stands in the heart of the city. It is the principal crossing of the river, or at least the crossing closest to the centre of the complex pattern of spaces and streets which makes up the city. Standing on the bridge above the river, in a place of surprisingly intimate character, one can look north past St. Clements' Church and along Magdalen Street, west and south to where the clock tower of City Hall rises proudly above the cityscape, and the lead covered cupola of St. Peter Mancroft can also be glimpsed, south along Wensum Street as it rises, and past the Church of St. Simon and St. Jude, and south-east to where the cathedral's spire rises above the buildings of riverside. These views are not unblemished, but they are rich in history, architectural interest and beauty.

8.57. The sight of the tower block rising to the north would mar this experience²¹⁰. The new tower could not pretend to the interest, character or meaning of the old. Glimpsed

²¹⁰ CD7.81 SEI (t), Compendium of Views, pp. 118-119, view 56.

above the roofs, it would suggest the alien scale of the proposed redevelopment and in doing so set itself apart from the city's historic towers²¹¹.

8.58. I draw the following conclusions.

- a) The proposed development would seriously compromise the quality of intimacy, which is an important facet of the character of the Norwich City Centre Conservation Area and contributes much to its significance. It would simultaneously harm the appearance of the conservation area.
- b) In doing so it would cause serious harm to the character and appearance of the Colegate and Elm Hill and Maddermarket character areas of the conservation area in particular, and would cause serious harm to the significance of the conservation area.
- c) The development would also cause harm to the significance of a large number of historic buildings, designated as listed buildings, within these areas. It would cause serious harm to the significance of Doughty Hospital. The significance of Bacon House, Colegate; 2-9, Octagon Court, Calvert Street; St. George's Church, Colegate; those of the buildings of Tombland which are listed; and St. Peter Hungate would all be harmed.

²¹¹ CD11.18. HE GPA, step 3, attributes: change to general character (e.g. urbanising or industrialising).

The Image of the City

- 8.59. From Fye Bridge I shall move to examine the effect of the proposed development on the image of Norwich, considering first its effect on the significance of the city's principal monuments and buildings and then that on the great panorama of Norwich obtained from the heights to the east.
- 8.60. The Cathedral of the Holy and Undivided Trinity is Norwich's greatest building. As has been seen, its scale and presence within the wider cityscape are fundamental to its significance, and to the character and appearance of the conservation area. The tower and more particularly the spire appear in views across the city, views which vary from broad and encompassing to narrow, particular and incidental. All contribute to one's appreciation of the cathedral church's historic and architectural interest, and to its place as one of the principal monuments which contribute to the character of the city as a whole.
- 8.61. Were the proposed redevelopment of Anglia Square to go ahead both the presence of the tower block and the bulk of the development as a whole would damage the significance of the cathedral and its place in the cityscape. Nothing in Norwich today rivals the presence of the cathedral's tower and spire, notwithstanding the fact that there are tall buildings which already detract from the city's character. The 20-storey tower block would rise nearly to the height of the spire. Despite the modelling of its design it would be seen in wide views of the city as a monolithic block. Its presence

would rival and distract from the pre-eminence of the cathedral in a way which no other single structure in Norwich does.

8.62. I have already noted the differences between the historic cathedral's tower and spire and the proposed tower block – differences of form, character and meaning²¹². It is these differences which underlie the harmful impact which the presence of the tower block would have on that of the tower and spire in the cityscape, and, therefore the harm which the tower block in particular would do to the cathedral's significance.

8.63. In a variety of views across the city the presence of the tower block would distract from the pre-eminence of the spire. The historic purpose of tower and spire, that of announcing the presence of the cathedral, demonstrating the place of the church in the spiritual and secular ordering of the world, and announcing the presence of the house of God in the heart of the city, would be subverted. So too would be the spire's contemporary role, as the city's pre-eminent historic monument and as a peerless work of art. The simple presence of the tower block would drain something of what makes the tower and spire special. It would, itself, have nothing of meaning which would allow it to claim a place in the complex interplay of ecclesiastical, royal and civic buildings which articulate the cityscape of Norwich.

8.64. The presence of the tower block would be compounded by the vast scale of the proposed development looked at as a whole. Although some 19th century and more 20th century development increased the scale of Norwich's cityscape north of the

²¹² See above, pp. 83-84, paragraphs 7.18-19.

river, and some recently permitted development may do so to a more pronounced degree, nothing would compare with the immense and extensive bulk of the proposed development²¹³. Consequently views to the cathedral would be compromised by the bulk of the development as well as by the tower block.

8.65. This would be particularly so in views from the north. From the Aylsham Road, for example, one currently sees the spire rise above the roofs of a curved terrace, partly obscured by Sovereign House but otherwise little disturbed. Were the proposed development to be built, the bulk of the new Anglia Square would rise considerably above the roofs of the terrace, and would terminate only a little below the top of the spire²¹⁴. The effect of the development would be to reduce the prominence of the cathedral's spire, and to erode markedly the hierarchical relationship between spire, for which read "cathedral", and city²¹⁵. Similar points might be made in relation to some of the views considered above in respect of the environs of Anglia Square.

8.66. Finally I turn to a more intimate view, the quintessential view of the cathedral across the playing fields within the Close. The incursion of the proposed tower block into this view would be highly damaging to its character, and would detract both from one's appreciation of the cathedral's setting, and therefore its significance, and from

²¹³ See HE1/5 Appendix 4: Tall Buildings in Norwich. As noted above, there are a number of tall buildings which already harm the character of the city, particular those on or close to All Saints Plain.

²¹⁴ CD7.81 SEI (t) ES (SEI) Compendium of Views, pp. 34-35, view 14. (In this view the tower block is partially concealed, but it would probably be in full view from the opposite side of the street to the position of the camera.)

²¹⁵ CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising)

one of the places which contribute particularly to the character and appearance of the conservation area²¹⁶.

- 8.67. I consider that the proposed development would cause considerable harm to the significance of the cathedral.
- 8.68. The castle vies with the cathedral for pre-eminence in the historic cityscape of Norwich. Its architecture of European importance, its historic interest outstanding, the castle's significance is closely bound up with its position and setting. That setting would be severely compromised by the proposed development; and the castle's significance would thereby be harmed.
- 8.69. The views from the castle have been described above, as has their importance to its historic function and present meaning. From the terrace at the top of the motte, from which the castle keep rises, the proposed redevelopment would be visible and prominent to the north²¹⁷. In the middle ground of the panorama from the motte, as one looks towards Anglia Square, are the tower of St. Andrew's Church and the cupola of the National Westminster Bank, both themselves structures of character and interest²¹⁸. The proposed tower block would appear between them, immediately to the left of the cupola, and taller than both cupola and tower (although not as tall

²¹⁶ See above, p. 46, paragraph 6.24. CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; competition with or distraction from the asset; change to skyline, silhouette; change to general character (eg urbanising or industrialising).

²¹⁷ CD7.81 SEI (t) Compendium of Views, pp. 30-31, view 12.

²¹⁸ St. Andrew's is a substantial Perpendicular church dating from the late 15th and early 16th centuries; it is listed at grade I: NHLE - <https://historicengland.org.uk/listing/the-list/list-entry/1051891>; the bank of 1924 is an especially splendid manifestation of the classicism of inter-war banks, modelled on Wren's churches; it is listed at grade II: NHLE - <https://historicengland.org.uk/listing/the-list/list-entry/1051217>.

as the former's wind-vane), and above the copper dome that crowns the turret of the former Technical Institute of 1899, where St. George's Street meets the river.

8.70. The immediate impression provoked by this view is of the gross disparity in scale between the historic cityscape and the proposed development. The fact that the distant tower would be taller (though slimmer) than the tower and cupola of church and bank would be a clear indication of its exceptional height. So too would be the way in which it rises above the horizon. Its scale would be underlined by its character, which again would contrast with that of the church tower and the cupola. The latter are both boldly modelled in respect of their scale, St. Andrew's tower buttressed and terminating with a large traceried window, and the bank's cupola terminating in a composition of a full classical order framing arched openings supporting an entablature and attic above, and culminating in a four-sided lead-covered dome. The tower block's elevations would comprise merely repeated vertical accents framing uniform fenestration, broken only by surface patterns and the glazed cants at the blocks' corners.

8.71. The impression of disparity would be largely compounded by the sight of the development as a whole extending to either side of the tower to form the backdrop to the cityscape. In this view the new "Anglia Square" would stretch from the tower of St. Andrew's in the west to beyond the bank's cupola to the east, across the long green copper roof of St. Augustine's Hall, another important component of the historic cityscape as seen from the castle looking north. The "vertical disparity"

between the tower block and the city would be matched by an equivalent “horizontal disparity”.

8.72. This effect would be manifest in three ways. First, the new development would replace the wooded ridge of the northern slope of the river valley as the outermost setting of the city. Second, the massiveness of the development’s components would lend them a presence quite distinct from the manner in which the low roofs of the countless buildings of the outer parts of the city merge into one another and are interspersed with planting. Third, the effect of the river valley, and the relation of St. Augustine’s Hall to it, coupled with the considerable height of the majority of the proposed buildings, would be such as to make the new buildings rise above the Hall’s roof almost unmasked by other development, presenting to the viewer a wall of new building of a scale quite unnatural in this city.

8.73. The implications of all this for the setting of the castle, as well as for the character of the historic city as a whole, would be profound and deleterious.

8.74. As has been shown, the choice of the castle’s site was above all strategic, in the sense that it was built to command both the city and the river valley²¹⁹. From the castle terrace it remains possible to survey the city and to see, looking north and east, the wooded ridge of the river valley, despite the transformations the city has undergone in the course of 900 years²²⁰. This contributes powerfully to the castle’s significance, and to that of the historic cityscape, as represented by the city centre conservation

²¹⁹ See above, pp. 41-42, paragraphs 6.10-6.11.

²²⁰ CD2.10 NCC CAA, p. 4.

area. To mask a considerable stretch of the ridge with development, as would the proposed scheme, would seriously erode the way in which the castle's topographical setting could be appreciated. The effect would be exacerbated by the fact that not only the tower block but also the upper parts of at least four others of the proposed buildings would rise above the line of the ridge²²¹.

8.75. The castle's significance derives from more than its historic military role. It is a work of architecture of exceptional interest. Its particular architectural interest comes from the unique articulation of its facades, but this apart it is a monumental building and its character as such serves today, just as it would have done in the 12th century, to make it one of the great monuments of the city. Here too the careful siting of the building to take advantage of the river valley's topography contributes to this aspect of the castle's significance. While less conspicuous than the cathedral's spire and tower, the castle's presence in the cityscape is a considerable one, whether in incidental views or in vistas across, or panoramas of, Norwich²²².

8.76. I shall turn to the effect of the proposed development on the great views of the castle in panoramas of Norwich below, but note here its less obvious impact on the pre-eminence of the castle within and across the city. The views variously of the tower block and the totality of the proposed development which have been explored above in the context of their impact on the intimate character of various parts of the city

²²¹ CD11.18. HE GPA 3, step 3, attributes: position in relation to relevant topography; position in relation to key views to, from and across; change to built surroundings and spaces; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

²²² CD7.81 SEI (t) Compendium of Views, p. 21, viewpoint 8 (panoramic version); p. 25, viewpoint 9 (panoramic version); see also HE1/4 Appendix 3: Artistic Representations of Norwich.

would also affect the city as the wider setting of the castle. The presence of development whose scale and grain were at odds with the complex and subtle fabric of the city, closing vistas and rising above the pattern of the cityscape, would also subvert the historic and architectural hierarchies which lend structure and meaning to the character of the city. In doing so that development would detract from the setting of the castle and from its significance as one of the city’s great landmarks²²³.

8.77. When these effects are considered together I conclude that the impact of the proposed development on the significance of Norwich Castle would be markedly harmful. This conclusion is, of course, at odds with that put forward by the applicants’ consultants in support of the application. So contrary are our conclusions that it may be helpful to take the case of the castle to explore further the nature of the consultants’ approach, and how it differs to that presented here²²⁴.

8.78. The consultants suggest that the “significant change within the asset’s [i.e. the castle’s] extended setting” would have “a minor beneficial impact” on its significance. They advance three arguments to support this conclusion: that the new buildings on Magdalen Street would enhance views of the castle from there; that the architectural design of the scheme as a whole would be sympathetic to the castle’s setting; and that it would both introduce “an element of time depth” to the castle’s setting, and “ground the asset in its broader urban context”. The latter

²²³ CD2.10. NCC CAA, p. 17; CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; change to general character (e.g. urbanising or industrialising)

²²⁴ CgMs, Addendum to Built Heritage Statement, August 2018, p. 13, table (number 10) and analysis, p. 95.

arguments have already been considered in section seven of my proof, and I have set out my analysis of the views from Magdalen Street.

- 8.79. That leaves the question of the relationship between the design of the proposed development and the significance of the castle to consider. The idea that the tower block “has been designed as a strong visual counter-point to historic landmarks in Norwich... including Norwich Castle” is asserted, but not justified. What is absent from the consultants’ argument is any consideration of this idea informed by analysis or understanding of the castle’s significance. The same points apply equally to other aspects of the consultants’ analysis: the suggestions that “the general massing will lend variety and interest to northward views from the castle ramparts” and “The tower in particular will enliven these long range views imbuing them with a sense of vitality and positive transformation”, are made without reference to either historic character or to the way in which the castle’s setting contributes to its significance.
- 8.80. The absence of any sustained analysis of or reference to the significance of the castle in the consultants’ argument, and the consequent failure to consider the effect of the proposed development in relation to the elements of the castle’s setting which contribute to its significance, deprives it of force²²⁵.
- 8.81. A similar analysis of the proposed development’s effect to that I have set out in respect of both the medieval cathedral and the castle could be provided in respect of

²²⁵ It is also necessary to note an error in the consultants’ analysis: it is not true that only the tower block would rise above the skyline.

the 19th century cathedral, City Hall and the medieval churches which are so integral a part of Norwich's history and character.

- 8.82. As has been seen, both the Catholic cathedral and City Hall were sited on the prominent ridge above the river valley in such a way as to make them landmarks across the city. The significance of both is enriched by their relationship with other historic monuments and buildings, by the character of the surrounding cityscape, by views from them and to them, and by their prominence and roles as focal points.
- 8.83. The presence of the tower block especially would harm the prominence of both buildings in the cityscape as a whole. The effect of the development would largely be experienced at a distance from the buildings themselves, although the tower block would rise above the north side of the Market Place in the view from Millennium Plain²²⁶.
- 8.84. In the latter view, the upper floors of the building would appear above the medieval Guildhall and be visible in the view across the front of City Hall: its presence, albeit relatively inconspicuous, would erode the character of the space to some degree, and touch on the significance of both buildings²²⁷.
- 8.85. The much greater effect of the development when seen with these buildings in long views is illustrated by the view from Mousehold Avenue²²⁸. The bulk and height of the whole development here would serve to diminish the presence of the cathedral in

²²⁶ CD7.81 SEI (t) Compendium of Views, p. 28-29, view 11.

²²⁷ CD11.18. HE GPA 3, step 3, attributes: change to skyline, silhouette.

²²⁸ CD7.81 SEI (t) Compendium of Views, p. 14-15, view 7.

the wider view, and so would harm the viewer’s appreciation of the building’s significance²²⁹.

8.86. Norwich’s four greatest monuments – the castle and medieval cathedral, the 19th century cathedral and City Hall – are the city’s principal landmarks, but their place in the cityscape is immeasurably enriched by the presence of the city’s medieval churches. Whether themselves landmarks across the city – as are St. Peter Mancroft and St. Giles – or landmarks within their own enclaves of the city, they all contribute to the richness of architectural and historic interest which gives Norwich its remarkable character; and that accumulation of interest contributes to and enhances the significance of the historic buildings individually.

8.87. The effect of the proposed development on the significance of both St. Peter Mancroft and St. Giles would be similar in kind to its effect on the four great landmarks. Its effect on the city’s medieval churches in general would be more complex. In some cases, as suggested above, the presence of the development in a church’s setting would harm both that setting and, through it, the significance of the church itself. In other cases, churches might seem essentially screened from the development and unaffected by it – for example, St. Martin-at-Palace. In fact, however, the presence of the proposed development would damage the setting of almost all of the city’s medieval churches, if not indeed all of them, as its mass and

²²⁹ CD11.18. HE GPA 3, step 3, attributes: prominence, dominance, or conspicuousness; competition with or distraction from the asset; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

height would radically disrupt the subtle harmony created by the “music” of the church towers whose presence articulates the roof-scape of the city²³⁰.

8.88. It is from the Mottram Monument on St. James’ Hill that the best panorama of Norwich can be obtained, and it is from here that one can best appreciate what I have called “the image of the city”²³¹. The valley of the Wensum lies below. Directly opposite stands the cathedral rising from the floor of the valley, seemingly at once reliquary, architectural model and monumental work of art, such are the curious effects of scale. The experience is quite unlike that suggested by the photomontage, in which the cathedral is a distant object in a flat image. Standing on St. James’ Hill one feels one could reach out to touch the building. Around it is the precinct, with, to the right, the further precinct of the Great Hospital. Behind, the ground rises to the ridge extending from Ber Street, and above the valley one sees the castle keep, St. Peter Mancroft with its distinctive lead-covered spirelet, City Hall resembling some palace in a central European town and its clock tower rising to the height of the pinnacles of the cathedral tower, and to the right of the cathedral, still on the ridge, the tower of St. Giles immediately next to the greater bulk of the 19th century cathedral and its tower.

8.89. The wider cityscape is marked by the towers of the city’s medieval churches, in this view most densely concentrated on the slopes falling to the river and close to its

²³⁰ CD7.81 SEI (t) Compendium of Views, p. 18-21, view 8. CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

²³¹ CD7.81 SEI (t) Compendium of Views, p. 18-21, view 8 (as above).

northern bank. One can see the towers of St. Helen's, in the foreground of the cathedral; St. Peter Hungate, above the north transept; St. Gregory and St. Giles, the former in the foreground of the latter; St. Laurence, to the right of the Catholic cathedral; St. Martin-at-Palace, to the north or right of the precinct; St. Margaret and St. Benedict, to the right or north of St. Laurence; and, north of the river, St. Clement, across the river or to the right of St. Martin; St. George, Colegate, taller and to the right and beyond; St. Michael Coslany, again taller, and to the right of and beyond St. George; and, finally, and less distinctly, St. Edmund, a slight presence in the roof-scape between St. Michael to the left and the bulk of Jarrold's handsome Printing Works, with its copper domelet, to the right. One may also note the pyramidal roof of the Octagon Chapel rising between the towers of St. Edmund's and St. Michael's Churches.

- 8.90. The prospect of Norwich from St. James' Hill is exhilarating. The topography of the river valley is evident and dramatic. Cathedral, castle, City Hall and churches together shape and lend meaning to the cityscape. The whole is encircled by wooded ridges. The cityscape is not unblemished, but it is exceptional. This must be one of the finest panoramas of an English city.
- 8.91. The effect of the proposed development on this view would be considerable. Into this panorama would intrude a development whose colossal scale would be wholly at odds with the scale and character of the historic city. The bulk of the development as a whole – before one even considers the tower block – would rise high above the

surrounding cityscape, a city within a city²³². The radical disparity between Norwich's cityscape and the new development would be destructive of the continuity or coherence of the cityscape, something which contributes vitally to the city's character, and to the character of the settings of so many of its buildings²³³.

- 8.92. The presence of the 20-storey tower block would of course greatly exacerbate the development's impact on the city's character. I have already described its effect from various vantage points in the city, both near to its site and distant. From St. James Mount it would rise high above the horizon, and high above the expanse of the entire northern city. Looking across the city as a whole, it would seem to rise above everything apart from City Hall's clock tower and the tower and spire of the cathedral itself. Its height would be compounded by its form, that of a simple rectilinear structure. The tower would reduce the towers of the city's medieval churches to features of modest significance in the cityscape. Compared to those few structures which would not be wholly eclipsed by it, it would seem both disproportionate and un-modulated. The 19th century cathedral's crossing tower, although also rectilinear, is articulated by its large and deep openings; the buttressed tower of St. Peter Mancroft is strongly modelled, and is crowned by a complex spirelet; and even the sheer brickwork of City Hall's clock tower diminishes as it rises to terminate in its handsome copper lantern. Against these riches, the subtle surface patterns of the proposed tower would count for little in long views.

²³² As noted above, p. 7, paragraph 1.8, this is the planning officers' description.

²³³ CD11.18. HE GPA 3, step 3, attributes: position in relation to relevant topography and watercourses; position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

- 8.93. Although the tower block would not rise above the spire, it would challenge the cathedral's pre-eminence in the view. The cathedral's tower and spire would remain the principal accent, of course, but although the new tower would seem only to reach the height of the pinnacles to the Norman tower, and although that tower would be the one structure broader than the new tower, the latter's blank, unmodulated form, rising from the lower northern city would profoundly change the character of the view, distracting from the presence of the cathedral and undermining the position it has held in the cityscape of Norwich since the tower was completed in the 12th century, and still more so since the completion of the spire in the 15th²³⁴.
- 8.94. These points may be reformulated with reference to Historic England's approach to the assessment of the effect of development on the setting of heritage assets, and through setting, on their significance. The following points apply, when considering the view from St. James's Heights, to all the important monuments and buildings whose presence in this view has been noted.
- 8.95. In respect of location, the site of the proposed development would mean that it would be visible and, due to its size, conspicuous in this exceptionally fine view, and would stand out very distinctly from the relatively modest development around it.

²³⁴ CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

- 8.96. In respect of its form and appearance, the proposed development would be both prominent and conspicuous, and it would dominate much of importance – notably the lesser medieval church towers – while distracting from the place of Norwich’s greatest monuments in the panorama of the city. This effect would follow from the developments dimensions, scale and massing, and to some extent from its architectural style.
- 8.97. In respect of the development’s wider effects, it would radically change the skyline of the city and with it the city’s silhouette. It would change the general character of the cityscape in a damaging manner, as although the modern development which it would replace is itself harmful to the character of the city, the proposed development would form an area of very large blocks, coupled with a tower, the general character of which would be radically at odds with the prevailing character of Norwich²³⁵.
- 8.98. I draw the following conclusions.
- a) The effect of the proposed development on the image of the city – on the way in which historic Norwich, its principal landmarks and its cityscape are perceived and appreciated would harm the significance of the city.
 - b) Its impact would cause very considerable harm to the character and appearance of the Norwich City Centre Conservation Area. This would be particularly evident when looking over the city from St. James’ Hill.

²³⁵ CD11.18. HE GPA 3, step 3, attributes: position in relation to key views to, from and across; prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing; architectural and landscape style and/or design; change to skyline, silhouette; change to general character (e.g. urbanising or industrialising).

c) Its impact would cause very considerable harm to the significance of the Cathedral of the Holy and Undivided Trinity and to that of the castle, both buildings of the highest significance, and harm to that of Norwich's other principal landmarks, the Catholic cathedral, City Hall, St. Peter Mancroft and St. Giles' Church, which are all also of very high significance.

d) Its impact would also harm the significance of many other historic buildings which together make up the historic cityscape, notably the churches mentioned in this part of this section.

8.99. By considering the effect of the proposed redevelopment of Anglia Square on historic Norwich from three perspectives I have endeavoured to explain its impact in a way which synthesises what could be a long series of individual effects. Below I draw together the conclusions of these three approaches to summarise broadly the effect of the proposed redevelopment.

8.100. First, the proposed development would entail some benefits to the character and appearance of the Norwich City Centre Conservation Area and to the significance of some of the city's designated heritage assets. These would follow from the demolition of the majority of the existing buildings, the development of the empty sites, the partial reinstatement of lost streets and some improvement to the quality of buildings on Magdalen Street. These benefits could, potentially, be important ones; but it is difficult to separate them from the development itself, which would

largely negate them. I consider that the benefits which the proposed development would realise would be of modest degree.

- 8.101. I now turn to review the harm which the proposed development would cause.
- 8.102. The proposed development would be profoundly harmful to the character and significance of Norwich, as represented by the city centre conservation area. The great views of the city from the heights to the east would be seriously compromised and the view across the city from the castle motte would be equally harmed. The eastern view of the cathedral from within the precinct would be spoilt. Across the city, but particularly in Tombland, Elm Hill, Colegate and its adjacent streets, the intimate qualities of many of the city's ancient spaces and streets would be compromised. St. Augustine's Church and other buildings and streets in the environs of Anglia Square itself would be dominated by the scale of the new development.
- 8.103. I conclude that that the harm to the character of the Norwich city centre conservation area would be severe.
- 8.104. The effect of the proposed development on many of the city's buildings would also be harmful, sometimes to a high degree. The city's great landmarks – the medieval cathedral, the castle, the 19th century cathedral and City Hall all derive a notable part of their interest from their setting. The development would radically change their settings, damaging their settings' contribution to their significance, and so cause considerable harm to that significance. The city's medieval churches – lesser landmarks – are exceptional in their number and remarkable for the role their towers

play in the cityscape, speaking one to another across the roof-scape. The development would be highly damaging to the buildings' relationship to each other through their setting, and cause marked harm to their significance. To those buildings which are not landmarks but define the spaces and streets of the city which would be affected by the development, the contribution made to their character and interest by the authenticity and integrity of their settings would be eroded, causing varying degrees of harm to their significance. For the same reason, to those buildings close to Anglia Square itself, the overwhelming scale and alien character of would compromise their settings, sometimes radically, causing harm to the significance, in some instances of a high degree, and, in the case of St. Augustine's Church and Guildencroft that harm would be severe.

- 8.105. Using the Framework's classification, I consider that the harm caused by the proposed development would in every case be "less than substantial". As I have noted above, the phrase "less than substantial" serves only one purpose in the Framework, that of distinguishing this category of harm from "substantial harm". "Less than substantial" harm, therefore, encompasses all harm other than substantial.
- 8.106. I consider that the severe harm which the proposed development would cause to the Norwich city centre conservation area would approach, but fall below, the threshold of substantial harm. The varying degrees of harm which would be suffered by the monuments and buildings I have considered here would fall at varying points in the scale of less than substantial harm.

8.107. I consider the effect of the proposals for the redevelopment of Anglia Square which are the subject of this inquiry would profoundly harm the qualities which make Norwich one of England's finest historic cities.

9. THE IMPACT OF THE PROPOSED DEVELOPMENT CONSIDERED IN THE LIGHT OF LAW, POLICY, GUIDANCE AND PUBLISHED ADVICE

- 9.1. Having reviewed relevant law, policy, guidance and advice, and explored the significance of Norwich and the effect of the proposed development upon that significance, I shall now turn to consider these together, and to set out Historic England's position.
- 9.2. Norwich is a city of exceptional significance, as is reflected in its wealth of designated heritage assets. The proposed redevelopment of Anglia Square would affect the significance of many of these assets, including that of the most important, and that of the Norwich City Centre Conservation Area itself. The statutory tests established by the Listed Buildings Act 1990 are engaged, as is the Framework's requirement that great weight be given to the conservation of designated heritage assets. The proposals would give rise to modest heritage benefits, but would cause extensive harm, often of marked or considerable, and sometimes severe, degree. All harm to designated heritage assets requires justification. The justification offered in this case is doubtful. While the full balancing exercise is for the decision-maker, the harm which would be caused to designated heritage assets would decisively outweigh such heritage benefits as would arise. In addition the proposals would run counter to the Local Plan's policies to protect the historic character of Norwich. They would also run counter to both national and local policies for design where these intersect

with heritage policies. Finally the proposals are contrary to Historic England's guidance in respect of tall buildings.

The Proposals Considered in the Light of the 1990 Listed Buildings Act and the Historic Environment Policies of the Framework

- 9.3. As has been shown, Norwich is a place of the highest significance. The city is one of England's – and Europe's – great historic cities. The exceptional archaeological, architectural, artistic and historic interest of the city, as encompassed by the circuit of the city's medieval walls, is reflected in the designation of the Norwich City Centre conservation area. While conservation areas are not formally graded, this must be considered a conservation area of extraordinary significance. If one were to seek a comparator one might look to York.
- 9.4. This extraordinary significance in part reflects the exceptional status of particular monuments and buildings within the city. As has been noted, both castle and medieval cathedral are buildings of European importance; but the city is rich in monuments and buildings of high interest, as is reflected in both schedulings and the wealth of listings at grade I and II*. Nor is the national importance of the many buildings listed at grade II in doubt.
- 9.5. The protection afforded to those elements of the historic environment designated as heritage assets is considerable. Designation, whether by the Secretary of State of scheduled monuments and listed buildings, or by local planning authorities of conservation areas, marks those elements or aspects of most significance.

- 9.6. The Listed Buildings Act 1990 establishes the statutory tests which decision-makers must apply when dealing with planning applications affecting listed buildings or conservation areas, requiring them to have “special regard to the desirability of preserving” the former, and their setting, and to pay “special attention... to the desirability of preserving or enhancing the character or appearance” of the latter²³⁶.
- 9.7. The Framework, more generally, establishes that the protection of the historic environment forms one part of the environmental objective integral to the pursuit of sustainable development, and that it is the significance of heritage assets which should be sustained and enhanced²³⁷.
- 9.8. It is evident that this is a case in which we are faced with things of exceptional significance. In such circumstances the Framework’s position is very clear. “Great weight” must be given to the designated heritage assets(s)’s conservation and “the more important the asset, the greater the weight should be”²³⁸.

Heritage Benefits and Harm

- 9.9. The proposed redevelopment of Anglia Square would entail both some benefit and harm to designated heritage assets.
- 9.10. As noted above, I consider that the benefits would be limited. They would be primarily to the character and appearance of that part of the conservation area

²³⁶ CD11.25. Listed Buildings Act 1990, sections 66.1 and 72.1. See above, pp. 18-19, 5.2, 5.3;

²³⁷ CD1.1. NPPF, 7, 8, 192. See above, pp. 20-21, paragraphs 5.6 – 5.9;

²³⁸ CD1.1. NPPF,193. See above, p. 21, paragraphs 5.10.

closest to the site, although there would also be some benefit to the significance of some nearby listed buildings. Although limited in degree, great weight must be given to these benefits²³⁹.

- 9.11. I consider that that the harm to the character of the Norwich City Centre Conservation Area would be severe. That harm would be the sum of the various “harms” to different parts and aspects of the conservation area’s character and appearance explored in section eight of this proof.
- 9.12. The effect of the proposed development on many of the city’s buildings would also be harmful. It would cause considerable harm to the significance of the city’s great landmarks – the medieval cathedral, the castle, the 19th century cathedral and City Hall. It would cause considerable harm to the significance of the city’s medieval churches. It would cause varying degrees of harm to many other buildings which define those of the spaces and streets of the city which would be affected by the development. For those buildings close to Anglia Square itself, the development would harm their significance, in some instances to a high degree; in the case of St. Augustine’s Church and Guildencroft that harm would be severe.
- 9.13. Using the Framework’s classification, I consider that the harm caused by the proposed development would in every case be “less than substantial”.

²³⁹ CD1.1. NPPF, 193. See above, p. 21, paragraph 5.10.

- 9.14. I consider that the severe harm which the proposed development would cause to the Norwich city centre conservation area would approach, but fall below, the threshold of substantial harm. The varying degrees of harm which would be suffered by the monuments and buildings I have considered here would fall at varying points in the scale of less than substantial harm.
- 9.15. Whatever its degree, all the harm which the development would cause to the various designated heritage assets which would be affected would engage the statutory tests and contradict the Framework’s objective of securing the protection and enhancement of the historic environment. The Framework’s requirement that great weight be accorded to the conservation of designated heritage assets and their significance is engaged, and in view of the exceptional significance of some of the designated heritage assets which would be affected the weight to be accorded in this case must be of the highest.

Justification

- 9.16. Also engaged is the Framework’s provision that all harm, regardless of whether it be “substantial” or “less than substantial”, requires “clear and convincing justification”²⁴⁰. Given the exceptional significance of some of the designated heritage assets affected, the importance of such justification is evident.
- 9.17. What the justification for such harm might be, from the applicants’ perspective, is not wholly clear, either from the application documents or from their Statement of

²⁴⁰ CD1.1. NPPF 194. See above, p. 22, paragraph 5.11.

Case²⁴¹. This is in part because their assessment of the effect of the proposed development is radically different to that I have set out here; but as even the applicants consider that some harm would be caused their own assessment engages the requirement for justification.

9.18. I question whether there is clear and convincing justification for the harm consequent on the proposed development. In so far as a justification can be inferred from the applicants' submissions it is one which rests on the balance of benefits and harm²⁴². They also argue that the scale of their proposed development, and the inclusion of at least 1,200 residential units, is necessary to make possible the redevelopment of the site²⁴³. This seems also to be Norwich City Council's position²⁴⁴.

9.19. While the desirability of redeveloping Anglia Square is common ground at this inquiry, the argument that securing its redevelopment would justify the harm which the application scheme would cause is not. It would be mistaken to cause severe and enduring harm to a place of such exceptional significance as Norwich simply because current economic conditions make the redevelopment of Anglia Square without such damage difficult. The history of the existing development should make the inappropriateness of this approach evident.

²⁴¹ CD11.2. See especially Statement of Case of the Applicant – Weston Homes PLC and Columbia Threadneedle Investments, 2.vijj.2019, section 6

²⁴² CD11.2. Statement of Case of the Applicants, 9.3

²⁴³ CD11.2. Statement of Case of the Applicants, 9.2.

²⁴⁴ CD11.1. NCC, Statement of Case, 15.11.

- 9.20. Conceived towards the end of the long post-War period of comprehensive development, the current Anglia Square quickly proved a misconceived venture. Never completed, it has long been seen as having harmed the character of Norwich, as is reflected in the conservation area appraisal²⁴⁵. Despite its failure, the physical nature of the development makes redevelopment difficult to achieve.
- 9.21. The proposed redevelopment would suffer from many of the same failings as the existing Anglia Square. Conceived on a scale radically at odds with the character of Norwich, the ambition and complexity of the proposals make them as vulnerable to being left incomplete as was the scheme of the 1960s, while the vastness of its construction would make its future removal even more difficult to accomplish than that of the existing buildings.
- 9.22. To suggest that the difficulty of securing the redevelopment of Anglia Square is so great that it would justify a scheme which would repeat and compound the mistakes of the 1960s and 1970s seems perverse. It falls far short of the very clear and convincing justification which the harm to the significance of Norwich which the proposals would entail must require.
- 9.23. This conclusion is strengthened by further considerations. The marginal viability of the scheme will be considered in Mr Rhodes' evidence on behalf of Historic England. That marginal viability has been achieved only with substantial public subsidy and

²⁴⁵ CD2.10. NCC CAA, p. 17 and p. 44.

the provision of affordable housing at a rate below the expectations of policy²⁴⁶.

These considerations further undermine the justification for the harm the development would cause.

A “Heritage Balance”

9.24. As Historic England’s remit concerns the historic environment rather than the full range of considerations material to planning decisions, I shall not offer evidence on the full range of benefits which would be procured, nor attempt a balancing judgement in respect of the application as a whole. I shall, however, assess the balance to be struck between harm to designated heritage assets and the benefits to the historic environment proposed by the applicants, and shall also comment on the nature of public benefits which could be considered to outweigh the harm I have described.

9.25. From the analysis set out above it is evident that I consider the “heritage balance” in this case to be clear.

9.26. The benefits would be important to Anglia Square character area of the Norwich City Centre Conservation Area, but they would be modest in the context of the conservation area as a whole. There would also be some benefits to a small number of listed buildings in the vicinity of Anglia Square.

²⁴⁶ CD11.1. NCC Statement of Case, paragraphs 10.7 and 10.9, pp. 17-18, and CD2.15. NCC Officers’ Report, paragraph 212, p. 67.

9.27. The harm caused by the proposed redevelopment would be extensive and considerable. The harm to the character and appearance of the Norwich City Centre Conservation Area as a whole would be severe. Severe harm would also be caused to the significance of St. Andrew’s Church and Guildencroft. Considerable or marked harm would be caused to the significance of Norwich’s principal landmarks, including the medieval cathedral and castle. Harm would be caused to the significance of the city walls. Harm would be caused to the significance of the city’s churches, and to numerous listed buildings.

9.28. I consider that such heritage benefits as the proposals would entail would be decisively outweighed by the harm that they would also entail. The benefits would be exceedingly modest in degree when compared with the harm.

9.29. I note one difficulty in this case, already touched upon in section eight of my proof. In many cases the purported benefits would be negated by the harm. In what sense, for example, would it be a benefit to remove the wasteland on Pitt Street, if the development which removed it were itself to be more harmful? I have endeavoured to distinguish benefits and harm in the preceding balance, but the exercise is to a degree artificial.

The Proposals Considered in the Light of the Local Plan

9.30. The severe harm effected on Norwich, as represented by the Norwich City Centre Conservation Area, and the harm likewise caused to numbers of the city’s monuments and buildings, designated by scheduling or listing, would be contrary to

the Joint Core Strategy’s expectations. The first of the actions to fulfil the policy for the enhancement of Norwich city centre is that of “enhancing the historic city, including its built, archaeological and environmental assets and its distinctive character as identified in conservation area appraisals”²⁴⁷.

9.31. That harm would also be contrary to Norwich City Council’s Development Management Policies Plan. The Plan’s policies for sustainable development expect development to “protect and enhance the physical, environmental and heritage assets of the city, and to safeguard the special visual and environmental qualities of Norwich”²⁴⁸. The proposed development would harm the heritage assets of the city and its special visual and environmental qualities, regardless of any improvement to the immediate qualities of Anglia Square itself. As the explanatory text supporting this policy notes, “Norwich will not benefit from badly designed, inappropriately located or poorly conceived proposals which clearly fail to deliver on sustainable development objectives”²⁴⁹.

9.32. As the Plan’s policy for safeguarding Norwich’s heritage refers directly to the Framework, there are no additional specific considerations to add to the assessment I have provided above.

9.33. The Council’s Policy Guidance Note, Anglia Square and the Surrounding Area, contains much pertinent to the conservation of the historic environment. It expects the redevelopment of Anglia Square to be one which “compliments the neighbouring

²⁴⁷ CD2.2. JCS, policy 2. See above, p. 26, paragraph 5.22.

²⁴⁸ CD2.3. NCC DMPLP, policy DM1, p. 27. See above, p. 26, paragraph 5.24.

²⁴⁹ CD2.3. NCC, DMPLP, policy DM1, paragraph 1.8, p. 29. See above, p. 26, paragraph 5.24.

area and reflects its location at the heart of the historic northern city centre”, and to “help to preserve or enhance the historic character of the surrounding area and key views”²⁵⁰. If my analysis of the effect of the proposed development on the character of Norwich’s city centre conservation area as a whole, and on the site’s environs, is accepted, it would do none of these things, but instead would aggravate the damage done by the existing development.

9.34. The Policy Guidance Note goes on to note that the existing development is recorded in the Conservation Area Appraisal as detracting from the character of the conservation area, and notes the guidance for the redevelopment of the site provided in the character area appraisal²⁵¹. I have already alluded to these above²⁵².

9.35. It may be useful to reproduce that guidance verbatim.

1. *Where the redevelopment of Anglia Square meets existing development along Magdalen Street the existing scale of buildings should be respected.*
2. *Large scale buildings appropriate near Ring-Road.*
3. *Reinstate an historic route between Magdalen Street and St Augustine’s Street.*
4. *Retaining significant open space of Anglia Square in any new development.*²⁵³

9.36. This guidance is more broadly drawn than the guidance in the Policy Guidance Note, which is informed by an acute awareness of the importance that should be attached to the relationship between any redevelopment and its surroundings. The Note goes

²⁵⁰ CD2.11. NCC PGN, 5.4, p. 16. See above, p. 29, paragraph 5.31.

²⁵¹ CD2.11. NCC PGN, 7.86, p. 40.

²⁵² See above, pp. 32-33, paragraph 5.41-5.42.

²⁵³ CD2.10 NCC CAA, p. 48.

on to state that “New development should be sensitive to the scale of existing buildings in its vicinity and must respect the setting of heritage assets”²⁵⁴.

9.37. The Policy Guidance Note also draws attention to the opportunity to reinstate and improve views from the north of the site towards the city’s major landmarks, to the potential impact of the development on views from the surrounding city, and to the desirability of establishing views from within the proposed development to landmarks such as St. Augustine’s Church²⁵⁵.

9.38. The proposed development would not conform to expectations of the Policy Guidance Note, for reasons which will be apparent from the analysis of its effect on the significance of Norwich in section eight of this proof, and from the consideration of the proposals’ heritage benefits in this section. While the proposed development would achieve some of the aspirations set out in the Note – for example, that of creating views to St. Augustine’s Church from within the site – it would be fundamentally at odds with the larger injunction that the redevelopment of Anglia Square should preserve and enhance the character of the conservation area, be sensitive to the scale of existing buildings and respect the setting of heritage assets.

The Proposals Considered in the Light of Policies for Design, both National and Local

9.39. I shall now consider the proposal in the light of policies and guidance relating to design, in so far as these relate to the conservation of the historic environment.

²⁵⁴ CD2.11. NCC PGN, 7.90, p. 42.

²⁵⁵ CD2.11. NCC PGN, 7.82, 7.84, p. 42. See above, p. 30, paragraph 5.35.

- 9.40. As has been noted, the Framework recognises that good design is fundamental to the achievement of the planning system’s objectives²⁵⁶. It therefore requires local planning authorities to ensure that developments achieve six objectives, which I consider below.
- 9.41. “a) [Developments] will function well and add to the overall quality of the area, not just for the short term but over the life of the development.” Given the analysis of the effect of the proposed development on the immediate and wider environs of Anglia Square what is proposed would not meet this requirement. As the scale of the development is such that it would affect the character of the city as a whole this failure would be particularly pronounced.
- 9.42. “b) [Developments] are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.” Whatever might be said about the articulation of the design of the individual buildings, and whatever expectations there may be in respect of the use of materials, the development would not be attractive when considered in the context of the historic city. It would rise above and stand apart from the grain of the city, and its discordance with the pattern of the city would be profound.
- 9.43. “c) [Developments] are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not discouraging appropriate innovation or change (such as increased densities)”. If the analysis of

²⁵⁶ CD1.1. NPPF, 124; see above, pp. 24-25, paragraphs 5.17-5.20.

the effect of the proposals set out in section eight of this proof is accepted, the proposed development would be radically at odds with this requirement.

- 9.44. “d) [Developments] establish and maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.” I have drawn attention to the limited degree to which the layout of the proposed development would reinstate the pattern of streets lost when Anglia Square was created, and the consequent limits to the accessibility, connectedness and permeability of the proposed development.
- 9.45. “e) [Developments] optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development ... and support local facilities and transport networks.” The exceptional quantity of development, and consequently density, for which planning permission is sought largely accounts for the discordance between the proposed development and the character of Norwich which I have described, and for the harm to the significance of Norwich that would follow. The proposals have not optimised the potential of the site to sustain a proportionate and balanced development: they have maximised the quantity of development which the site could possibly accommodate.
- 9.46. It is important to reiterate that these comments are not comprehensive comments on design, but deal with those matters raised by the Framework’s requirements which touch on the relationship between design and the historic environment.

- 9.47. Consideration of the proposed development’s conformity with the Local Plan’s policies on design – again in the light of their intersection with considerations relevant to the historic environment – shows it to be incompatible in a number of ways.
- 9.48. Development Management Policy 3 – Design Principles is the most important reference. This opens with a principle in respect of “gateways” to which I shall return below, after considering the other principles first.
- 9.49. In respect of long views, the Policy establishes a principle that careful attention should be paid in the design of new buildings “to the need to protect and enhance significant long views of the major landmarks identified in Appendix 8 [to the plan] and those identified in conservation area appraisal”²⁵⁷. The proposed development would damage such views, notably that from St. James’ Hill.
- 9.50. In respect of local distinctiveness and character the principle set out is that proposals should “respect, enhance and respond to the character and local distinctiveness of the area”. Design should “have regard to the character of the surrounding neighbourhood and the elements contributing to its... sense of place, giving significant weight to... the historic context of the site, historic street patterns, plot boundaries, block sizes, height and materials”²⁵⁸. Although some regard has been had to these things, as is reflected in the heights of the proposed buildings immediately adjacent to St. Augustine’s and Magdalen Streets, the overall mass and

²⁵⁷ CD2.3. NCC DMPP 3, a), p. 35.

²⁵⁸ CD2.3. NCC DMPP 3, c) p. 35.

bulk of the scheme is wholly at odds with the character and sense of place of its environs.

- 9.51. In respect of layout and siting a number of principles are established. Among them is the need to design to create “a permeable and legible network of routes and spaces”. Although arguably legible, the proposed development would, like the present development, be relatively impermeable²⁵⁹.
- 9.52. In respect of density the policy expects developments to achieve “a density in keeping with the existing character and function of the area”, provides that “higher densities will be accepted in the city”, but requires that density “must take account of the need to protect and enhance heritage assets and their settings”. There is nothing in this principle to encourage a density described by Design South-East as characteristic of major international cities, and the proposed design radically fails either to be in keeping with its environs or to protect or enhance Norwich – as represented by the city centre conservation area, the designated heritage asset of which the site forms part, or to protect or enhance the settings of the numerous designated heritage assets which it would affect.
- 9.53. As it fails to answer significant elements of the design policies set out in the Framework and Local Plan, so too does the proposed development fail to answer the parallel guidance provided by the Policy Guidance Note for Anglia Square in important ways²⁶⁰.

²⁵⁹ CD2.3. NCC DMPP, 3, d), p. 35.

²⁶⁰ See above, pp. 28-31, paragraphs 5.29-5.36.

- 9.54. The proposed development would not be one “with a distinctive identity that compliments the neighbouring area and reflects its location at the heart of the historic northern city centre” nor would it “help to preserve or enhance the historic character of the surrounding area and key views”²⁶¹.
- 9.55. The design of the proposed development would not take advantage of the “opportunity for significant enhancement to the character of the conservation area as well as to the setting of local heritage assets”. Although attention has been paid to the height of the buildings closest to St. Augustine’s Street and Magdalen Street, as noted already the scale of the development as a whole is such as to be radically at odds with their character. Consequently the design cannot be said to “be sensitive to the scale of existing buildings in its vicinity” or to “respect the setting of heritage assets”²⁶².
- 9.56. While the proposed development would not reinstate or improve views from the north towards the city’s major landmarks, it would create views from within the site towards both the cathedral and St. Augustine’s Church, as envisaged by the Planning Guidance Note²⁶³.
- 9.57. The Policy Guidance Note follows the Development Management Plan Policies’ identification of St. Augustine’s Street and St. Crispin’s roundabout as among the

²⁶¹ CD2.11. NCC PGN, 5.4 and 5.5, pp. 16-17. See above, p. 29, paragraph 5.31.

²⁶² CD2.11. NCC PGN, 7.86, 7.90, pp. 40 and 42. See above, p. 30, paragraphs 5.33-5.34.

²⁶³ CD2.11. NCC PGN, 7.88, 7.89, p. 40. See above, p. 30, paragraph 5.35.

“gateways” to the city. The relevant text is reproduced above²⁶⁴. It notes that the appraisal for the Anglia Square character area states that taller buildings are likely to be more appropriate to the southern end of the site, adjacent to the St. Crispin’s gateway.

9.58. Historically, of course, it is curious that a site deep within the walled and formerly gated city should be identified as a “gateway site” to the city. It is, however, this identification that provides such basis there may be in policy for the provision of a “tall building” at Anglia Square, or for the height and scale of the development as a whole.

9.59. The Local Plan policy encouragement of the development of “landmark buildings of exceptional quality” at main “gateways” to the city is, however, nuanced, as has been shown above²⁶⁵. In recognition of the sensitivity of Norwich’s historic townscape, the supporting text expressly states that “excessively tall or large buildings would be inappropriate in most gateway locations”, and states that the “expectation of this policy is that gateway sites would be marked by development of exceptionally high quality which relies for its distinctiveness on design aspects other than size or height”.

9.60. The proposed redevelopment would entail the construction of not simply an excessively tall or large building, but of an exceptionally tall building emerging from an amalgam of exceptionally larger buildings. It would form not simply a landmark

²⁶⁴ See p. 31, paragraph 5.36. . CD2.11. NCC PGN, 7.91 and 7.92, pp. 41 and 42.

²⁶⁵ See above, p. 27, paragraph 5.26. CD2.3. NCC DMPP, policy DM3, a, and paragraph 3.6 (pp. 35 and 38).

but a city within a city, as the Council’s planning officers put it²⁶⁶. The applicants’ approach is not at all that anticipated or encouraged by the Local Plan. Nor, considering the ways in which the design of the proposals falls short of relevant policy and guidance, can the approach be thought to be redeemed by its design. Indeed there is nothing, even in the second of Design South-East’s reports to suggest that the scheme is one of exceptionally high quality.

9.61. To conclude this consideration I shall turn to policies within the Conservation Area Appraisal beyond that considered above. The appraisal’s summary of the Anglia Square character area concludes as follows. “The area was subject to comprehensive redevelopment in the 1960s and 70s and is one of very poor townscape quality which visually severs the northern housing areas from the rest of the historic central area.”²⁶⁷ The appraisal also includes policies for management and enhancement of the character area, all of which concern the nature of any future redevelopment. They require future development to respect the scale of Magdalen Street where it meets that street; allow for large scale buildings near the inner relief road; require the reinstatement of the historic route between Magdalen Street and St. Augustine’s Street; and require the retention of a square²⁶⁸. A number of points must be made.

9.62. The first concerns the quality of the townscape. It is the case that the demolition of the existing development and its replacement with something new would in some

²⁶⁶ CD2.15. NCC Officers’ Report, paragraph 326, pp. 92-3.

²⁶⁷ CD2.10. NCC CAA, p. 43.

²⁶⁸ CD2.10. NCC CAA, p. 48.

senses create something of better “townscape quality”. The proposed development would be of some quality, in its own terms. Here, however, we are concerned with an area – that of the Norwich City Centre Conservation Area as a whole – whose character we are enjoined to preserve and enhance. Whatever the qualities of the proposed development, they would not respond to, preserve or enhance the character of the conservation area as a whole.

9.63. The second point concerns the relationship between Anglia Square, the historic cityscape to its north and that of the city’s centre to its south. The existing development severs the visual relationship between the two. I consider that the proposed development would do so to a much greater extent, given its much greater scale.

9.64. The applicants have put forward arguments to the contrary. They suggest that the reinstatement of something of the historic street plan, and creation of views from within the development to St. Augustine’s Church and the cathedral, would provide some sense of connection across the city. They also argue that the massing of the development has been informed by careful consideration of its impact, as illustrated in CGMS’ “heat map”²⁶⁹. There is some merit in the first point. For reasons set out above, I do not consider CGMS’s approach as illustrated by the heat map to be persuasive²⁷⁰.

²⁶⁹ CD4.86 ES Volume 3 (i) CGMS, Section 4.6, pp. 72-79.

²⁷⁰ For my assessment of the heat map see above, pp. 79-82, paragraphs 7.6-7.12.

9.65. The views from within the development, coupled with the minor improvements in views to the cathedral’s tower and spire, could not outweigh the effect of the much greater mass of the development as a whole, coupled with the presence of the tower block. Whether from the north of the city, or from the castle’s motte, or from St. James Hill, and no doubt too from many other vantage points, the bulk of the proposed development would both be radically at odds with Norwich’s historic character and exacerbate the severance of the pattern of the city – that fabric of spaces, streets and buildings of sympathetic scale which is so vital to the city’s historic character – already effected by the development of the 1960s and 1970s²⁷¹.

Historic England’s Published Advice

9.66. *The Setting of Heritage Assets* has informed much of the analysis. Here I shall consider the development briefly in the light of Historic England’s guidance on *Tall Buildings*.

9.67. The guidance notes that the definition of a tall building will depend on context. A ten-storey building amidst two-storey buildings will be “tall”²⁷². It is striking that in the context of Norwich, blocks A, E, F and G of the proposed redevelopment might reasonably be considered tall.

9.68. The guidance emphasises the importance of the development of tall buildings being led by the plan-making process. It notes: “In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a

²⁷¹ See section eight above.

²⁷² CD11.19. HE HEAN 4, page 2.

positive, managed approach to development, rather than a reaction to speculative development applications”, and it provides a number of reasons as to why this is important²⁷³. Among them are

Identifying the role and contribution of tall buildings, where appropriate, as part of an overall vision for a place

Maintaining protection of the setting of any designated heritage assets and the overall historic character that makes a city or area distinctive and special²⁷⁴.

9.69. The proposals for the redevelopment of Anglia Square have not been developed in response to the Local Plan, do not correspond to any vision for Norwich and would radically subvert the protection of the setting of many of Norwich’s designated heritage assets and severely harm the overall historic character that makes Norwich distinctive and exceptional. Even the Policy Guidance Note provides little support for the approach embodied in the application’s proposals.

9.70. The guidance expects good schemes to relate well to topography, character of place, heritage assets and their settings, urban grain and streetscape, important views including prospects and panoramas and the skyline²⁷⁵. I have suggested in section eight above that the proposals do none of these things.

9.71. The guidance concludes as follows

²⁷³ CD11.19. HE HEAN 4 – p. 4.

²⁷⁴ CD11.19. HE HEAN 4 – p. 5.

²⁷⁵ CD11.19. HE HEAN 4, paragraph 4.5, p. 8.

If a tall building is harmful to the historic environment, then without a careful examination of the worth of any public benefits that the proposed tall building is said to deliver and of the alternative means of delivering them, the planning authority is unlikely to be able to find a clear and convincing justification for the cumulative harm.²⁷⁶

9.72. I consider these proposals to be essentially contrary to the approach set out in Historic England’s guidance on tall buildings.

9.73. In conclusion, I consider that the proposals for the redevelopment of Anglia Square are fundamentally in conflict with the relevant national and local policies both for the conservation of the historic environment and for design.

²⁷⁶ CD11.19. HE HEAN 4, paragraph 5.5, p. 10.

10. AN ALTERNATIVE APPROACH TO THE REDEVELOPMENT OF ANGLIA SQUARE

- 10.1. The proposals for the redevelopment of Anglia Square put forward by Weston Homes and Columbia Threadneedle pose a question about the future of Norwich as a historic city. I have argued that those proposals would severely harm Norwich’s character and significance. Other parties at the Inquiry will argue in similar terms. The Council accepts that the proposals would cause considerable harm, albeit harm of less degree than I have suggested. There are clear and robust policies, both national and local, to protect the character and significance of the city and its historic buildings and monuments, and yet the Council concluded that the planning permission for the proposals should be granted.
- 10.2. In response to the application and the Secretary of State’s call-in, Historic England commissioned Ash Sakula Architects to prepare an alternative approach to the redevelopment of the site. It was encouraged by the acknowledgement in the Council’s Planning Guidance Note that there was “a wide variety of possible forms of development of the square that may be acceptable”, as well as by the fact that the Note itself was written explicitly in response to the proposals then being developed by the applicants²⁷⁷.
- 10.3. Historic England was also encouraged by the admirable initiative of St. Augustine’s Community Together and the Cathedral, Magdalen and St. Augustine’s Forum in organising a community consultation from which the Norwich – North City Vision: St.

²⁷⁷ CD2.11. NCC PGN, paragraph 2.2, p. 6.

Augustine’s and Anglia Square Regeneration Brief was developed²⁷⁸. This provided a brief setting out the community’s aspirations for the redevelopment of Anglia Square and of other nearby sites, a simple three dimensional representation of a possible plan and massing of development, and notes addressed to Weston Homes.

- 10.4. I note the consideration of alternatives in the Environmental Statement, which was summarised in the report to the Planning Applications Committee²⁷⁹.
- 10.5. If the Secretary of State agrees that the application scheme would cause material harm to the significance of the exceptional collection of designated heritage assets which together comprise historic Norwich then he may consider whether there is an alternative approach to the problem of Anglia Square.
- 10.6. Ash Sakula is an award-winning architectural studio led by Canny Ash and Robert Sakula. Historic England is familiar with their work at Tibby’s Triangle in Southwold, Suffolk, and the Malings, in the Ouseburn Valley in Newcastle. Both projects combine creative contemporary design with sensitivity to the historic contexts of the developments. The Malings, which has won a number of awards, is illustrated in the Ministry of Housing, Communities and Local Government’s recent National Design Guide, as well as in Historic England’s *Increasing Residential Density in Historic Environments*²⁸⁰. Also award-winning, Tibby’s Triangle was illustrated in *Constructive Conservation – Sustainable Growth for Historic Places*²⁸¹.

²⁷⁸ CD13.5. 2018. Henceforth “North City Vision” in references.

²⁷⁹ CD2.15. Officers Report, paragraphs 160-164, pp. 54-57.

²⁸⁰ CD13.4. MHCLG, 2019, p. 18; CD13.2. Historic England, 2018, pp. 12-13.

²⁸¹ CD13.3. Historic England, 2013, p. 33.

- 10.7. Ash Sakula’s proposals for the redevelopment of Anglia Square are presented in an appendix to this proof. They should be seen as an alternative approach to the redevelopment of the site, the purpose of which is to illustrate how the damage done by the 1960s and 1970s development might be undone through a development which provides much-needed housing and facilities for the community, repairs the pattern of the city and is yet wholly contemporary in spirit.
- 10.8. Ash Sakula’s proposals would reinstate not only Botolph Street between Magdalen Street and St. Augustine’s Street, but also Middle and Calvert Streets, and add to them, in place of the yards which were lost, a network of lesser streets and public and private spaces. These streets would be lined with buildings generally of three to four stories, brick-faced and simply articulated in a contemporary manner. A hotel, re-establishing the old Stump Cross, would rise to five stories, as would a small number of houses; and a cinema would rise a little above the rest. The development would conform to the pattern and grain of Norwich, repairing the damage done by the existing Anglia Square and creating something which answers, reinforces but also adds to the character of the city.
- 10.9. In practical terms, Ash Sakula’s proposals would provide much that both the Council and the community have identified as necessary or desirable in both the Planning Guidance Note and the Community Brief. They would provide 595 dwellings: the Note sets no maximum threshold but identifies a minimum of 250²⁸². They would

²⁸² CD2.11. NCC PGN, 7.9, p. 21. The figure is taken from the defunct NCCAAP.

provide x square metres of retail space in x units, and 48 workshops and studios, occupying 2,490 square metres. They would provide a hotel and a cinema, while also providing for the relocation of the Surrey Chapel. Its principal departure from the Community Brief is in providing 266 parking spaces only²⁸³.

10.10. I make two final observations on Ash Sakula's approach.

10.11. First, in the design of their proposals they have paid particular attention in both their laying out and articulation to the repair of the fabric of the city. The proposed hotel at Stump Cross would have considerable presence in its environs, and would fulfil some of the purposes of the landmarks or gateways to which the Planning Guidance Note refers, but the proposals do not seek to create landmarks at the expense of the character of the city. The proposals envisage the preservation of the 19th century buildings facing St. Crispin's roundabout, which occupy one of the site's suggested as suitable for a landmark. These buildings are locally listed²⁸⁴.

10.12. Second, Ash Sakula's proposals would substantially exceed both the Council's and community's aspirations to see the redeveloped area better provided with trees and green spaces²⁸⁵. The generosity of its planting reflects current concerns for the natural environment, but also recalls the contribution made to the character of the Norwich by the trees of Tombland and the planting of the city's numerous churchyards.

²⁸³ CD13.5. Community Brief, G and J, p. 4.

²⁸⁴ CD2.11. NCC PGN, 7.91, p. 42-3. CD2.10. NCC CAA, p. 47.

²⁸⁵ CD2.11. NCC PGN, 7.70-7.74, pp. 36-37; CD13.5. Community Brief, K, p. 4.

- 10.13. Historic England did not commission Ash Sakula’s proposals in order to present an alternative scheme to that of the applicants. It is not a developer. The presentation of an alternative scheme would require much more than Ash Sakula’s proposals, including financial assessment and a planning appraisal. Historic England noted, in its Statement of Case, that it did not believe that the proposals would, in current circumstances, be viable²⁸⁶.
- 10.14. In appending Ash Sakula’s proposals to this proof, I commend them to the Inquiry, not as an alternative scheme but as an illustration of how Anglia Square could be redeveloped in a manner which realises the aspiration of the Framework for development which is, in the fullest sense, sustainable. These proposals answer the Framework’s injunction that the social, economic and environmental objectives necessary to achieve sustainable development “must be pursued in mutually supportive ways”²⁸⁷.
- 10.15. As I have argued above, the applicants’ proposals would fall very far short of the Framework’s requirements in this respect. Were they to be implemented one of the England’s finest cities would be severely damaged. The character and appearance of the Norwich city centre conservation area would be neither preserved nor enhanced but severely harmed.
- 10.16. Ash Sakula’s proposals demonstrate that this is not inevitable. In concluding this section I make a simple point. There was a choice before Norwich City Council when

²⁸⁶ CD11.3. HE, SOC, 6.46, p. 33.

²⁸⁷ CD1.1. NPPF, 8. See above, p. 19, paragraph 5.5.

it considered the applicants' proposals, and there remains a choice before the Secretary of State. Refusal of proposals as harmful as are those before this inquiry should not be seen as refusal of any approach to the redevelopment of Anglia Square.

11. CONCLUSIONS AND RECOMMENDATION

- 11.1. Norwich is one of England’s great historic cities. Something of its wealth of archaeological, architectural and historic interest has been explored in this proof. This interest is reflected in its wealth of designated heritage assets.
- 11.2. The city is not unblemished. The buildings maps in the Norwich City Centre Conservation Area Appraisal give a fair indication of this. The 1960s and 1970s redevelopment of Anglia Square is widely recognised as among the most harmful developments in the city.
- 11.3. There is a broad consensus that Anglia Square should be redeveloped. Unfortunately the proposals for the comprehensive redevelopment of the site put forward by Columbia Threadneedle and Weston Homes, now subject to this inquiry, would profoundly harm the character of Norwich. They would replace the unsatisfactory development of the 1960s and 1970s with something far more damaging to the city.
- 11.4. In this proof I have argued that the proposed redevelopment would harm the significance of a wide range of designated heritage assets, which embody the interest of the city. These include the most important monuments and buildings in Norwich – among them the Norman castle and medieval cathedral. The degree of harm, always “less than substantial” in the language of the National Planning Policy Framework, would range from minor to severe; and there would be considerable

harm to the significance of the castle and cathedral. Above all, the proposals would severely harm the character, appearance and significance of the Norwich City Centre Conservation Area, which encompasses the extraordinary interest of the city.

- 11.5. Against that harm should be set modest heritage benefits, essentially affecting the site and its environs.
- 11.6. The proposals therefore engage the statutory tests of the Listed Buildings Act 1990, and the great weight the Framework requires to be attributed to the conservation of designated heritage assets. They run counter to Local Plan policies for the conservation of Norwich's character, and to national and local policies to promote and require good design. Ultimately, the proposals fall far short of the Framework's objective of securing sustainable development which brings social, economic and environmental benefits.
- 11.7. All harm to designated heritage assets requires clear and convincing justification. The justification in this case appears doubtful. What is proposed is a commercial development radically at odds with the character and significance of Norwich, dependent on substantial public subsidy to achieve marginal viability, and unable to provide public benefits, such as the Council's desired level of affordable housing, which would ordinarily be expected of such a development.
- 11.8. As Historic England comments on matters pertaining to the historic environment I shall not anticipate the general balancing exercise. I do note, however, that the severe harm to the significance of designated heritage assets decisively and

comprehensively outweighs such modest heritage benefits as the proposals would procure.

- 11.9. The proposals are profoundly at variance with the objectives of law and policy to protect designated heritage assets and the wider historic environment. In a place such as Norwich, these must apply with the fullest weight.
- 11.10. Historic England commissioned Ash Sakula Architects to provide an alternative approach to the redevelopment of Anglia Square. This is appended to my proof. I commend it to the inquiry as an exemplary approach to the redevelopment of Anglia Square. I do not suggest that Ash Sakula's approach would be viable in current market conditions. Nevertheless it is one that could provide much of what Norwich City Council and the local community wish for from the site, in a refreshing contemporary manner which is nevertheless wholly at one with the pattern of Norwich's historic development and the character of the city.
- 11.11. Great weight is to be given to the conservation of designated heritage assets, and as that weight should be proportionate to their significance in this case it should be of the highest. The Framework also requires good design. Ash Sakula's approach, which is sympathetic to the significance of the Norwich City Centre Conservation Area and the city's other designated heritage assets and is an exemplary response to the site, argues for the importance of securing a scheme for the redevelopment of Anglia Square which answers these objectives of policy.

11.12. On behalf of Historic England, I recommend that the Inspector, unless he concludes both that there is clear and convincing justification for the severe harm that the proposals would do to the extraordinary significance of Norwich, and that they would provide public benefits which would outweigh that harm, advise the Secretary of State to refuse planning permission for the application which is the subject of this inquiry.
